

UNITED STATES DISTRICT COURT

for the
District of Oregon

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Green Dodge Charger Vehicle (CA 8YAZ411) and
person of Bennie Gene London, as described in
Attachments A-1 and A2

Case No. 3:23-mc-302 A-B

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

The Green Dodge Charger Vehicle (CA 8YAZ411) and person of Bennie Gene London, as described in Attachments A-1 and A-2, attached hereto.

located in the _____ District of _____ Oregon _____, there is now concealed (identify the person or describe the property to be seized):

The information and items set forth in Attachment B-1 and B-2 hereto.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 USC § 2421	Transportation for Prostitution/Criminal Sexual Activity
18 USC § 1956	Money Laundering

The application is based on these facts:

See affidavit and Exhibit A which are attached hereto and incorporated herein by this reference.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Scott McCollister, FBI TFO

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
Telephone at 3:45 pm _____ (specify reliable electronic means).

Date: 04/12/2023

City and state: Portland, Oregon

Jolie A. Russo

Judge's signature

Jolie A. Russo, United States Magistrate Judge

Printed name and title

ATTACHMENT A-1
VEHICLE TO BE SEARCHED

Based upon the information contained in this affidavit, I am requesting a warrant to search the following vehicle:

Green 2021 Dodge Charger, California license plate 8YAZ411, VIN: 2C3CDXBG9MH632666, currently located in secure storage at PPB Rivergate Vehicle Storage Facility at 7027 NW St. Helens Road, Portland, Oregon.



ATTACHMENT A-2
PERSON TO BE SEARCHED

Based upon the information contained in this affidavit, I am requesting a warrant to search the following individual:

Bennie Gene London, black male, date of birth: XX/XX/1996, 5'7", 150 pounds



ATTACHMENT B-1

Items to Be Seized

The items to be searched for, seized, and examined, are those items in the 2021 Dodge Charger bearing California license plate 8YAZ411 (A-1) that contain evidence, contraband, fruits, and instrumentalities of violations of Title 18, United States Code, Section 2421, transporting an individual interstate or foreign commerce for purposes of prostitution and Title 18, United States Code, Section 1956, money laundering. The items to be seized cover the period of June 1, 2020 through the date of the execution of the search warrant.

1. The items referenced above to be searched for, seized, and examined are as follows:

a. Books, records, receipts, notes, ledgers, diaries, accounting, postings, communication and financial transactions relating to promoting and facilitating prostitution, prostitution and money laundering;

b. Personal books and papers reflecting names, addresses, telephone numbers, articles of clothing, photos and other contacts for the purpose of promoting or facilitating prostitution;

c. Financial profits, proceeds and instrumentalities of facilitating and promoting prostitution, prostitution and money laundering, including U.S. Currency, virtual currency including Bitcoin, Coinbase account records, bitcoin wallets, bitcoin transactions, prepaid debit cards, credit cards, CashApp cards, PayPal cards;

d. Books, records, receipts, notes, ledgers, and other documents relating to financial transaction, communications related to facilitating and promoting prostitution, prostitution and money laundering, and evidence of the use of individuals to disguise profits, vehicles,

apartments, vehicle purchase documentation, rental vehicles, property records, vehicle titles for the time period of June 1, 2020 to the present;

e. Firearms and other dangerous weapons, ammunition, magazines and body armor;

f. Personal books and papers reflecting names, addresses, telephone numbers, articles of clothing, photos and other contacts including identification data relating to the promoting and facilitating prostitution, prostitution and money laundering for the time period of June 1, 2020 to the present;

g. Financial records and personal objects relating to facilitating prostitution and prostitution income, money laundering and expenditures of money and wealth, to-wit: money orders, wire transfer records, cashier's checks and receipts, checks, bank account records, passbooks, tax records, W-2's, 1099's, safe deposit box keys and records, checkbooks, title files, vehicle purchases and check registers, as well as items of unexplained wealth including precious metals/jewelry such as gold, silver, diamonds, Rolex watches, earrings, pendants, necklaces, rings, etc., designer shoes, designer clothing, designer luggage including brands such as Gucci, Versace, and Luis Vuitton for the time period of June 1, 2020 to the present;

h. Items of personal property that tend to identify the person(s) in residence, occupancy, control, or ownership of the premises, including canceled mail, deeds, leases, rental agreements, photographs, personal telephone books, diaries, utility and telephone bills, statements, identification documents, and keys;

i. Documents indicating travel in interstate and foreign commerce, to include airline tickets, notes and travel itineraries; airline schedules; bills; charge card receipts; hotel, motel, and car rental statements; correspondence with travel agencies and other travel-related businesses; airline, rent-a-car, and hotel frequent flier or user cards and statements; passports and

visas; telephone bills; photographs of foreign locations; and papers relating to domestic and international travel for the time period of June 1, 2020 to the present;

j. Cellular telephones, computers and other electronic storage/communication devices capable of storing data to access the internet, book transportation services online, book hotel reservations, access e-mail, send and receive text messages, store records of financial transactions and debts, access online bank records that constitute evidence or instrumentality of facilitating and promoting prostitution, prostitution and money laundering.

Search Procedure for Digital Devices

1. Law enforcement may press the fingers and thumbs of LONDON to the sensors of his device for the purpose of attempting to unlock the device via biometric authentication. Further, law enforcement are authorized to point the camera of his device at the face of LONDON for the purpose of attempting to unlock the devices via biometric authentication.

2. The examination of the Device may require authorities to employ techniques, including but not limited to computer-assisted scans of the entire medium, that might expose many parts of the Devices to human inspection in order to determine whether it is evidence described by the warrant.

3. The initial examination of the Device will be performed within a reasonable amount of time not to exceed 120 days from the date of execution of the warrant. If the government needs additional time to conduct this review, it may seek an extension of the time period from the Court within the original 120-day period from the date of execution of the warrant. The government shall complete this review within 180 days of the date of execution of

the warrant. If the government needs additional time to complete this review, it may seek an extension of the time period from the Court.

4. If, at the conclusion of the examination, law enforcement personnel determine that particular files or file folders on the Device or image do not contain any data falling within the scope of the warrant, they will not search or examine those files or folders further without authorization from the Court. Law enforcement personnel may continue to examine files or data falling within the purview of the warrant, as well as data within the operating system, file system, software application, etc., relating to files or data that fall within the scope of the warrant, through the conclusion of the case.

5. If an examination is conducted, and it is determined that a Device does not contain any data falling within the ambit of the warrant, the government will return the Device to its owner within a reasonable period of time following the search and will seal any image of the Device, absent further authorization from the Court.

6. The government may retain the Device as evidence, fruits, contraband, or an instrumentality of a crime or to commence forfeiture proceedings against the Device and/or the data contained therein. The government will retain a forensic image of the Device for a number of reasons, including proving the authenticity of evidence to be used at trial, responding to questions regarding the corruption of data, establishing the chain of custody of data, refuting claims of fabricating, tampering, or destroying data, and addressing potential exculpatory evidence claims where, for example, a defendant claims that the government avoided its obligations by destroying data or returning it to a third party.

ATTACHMENT B-2

Items to Be Seized

The items to be searched for, seized, and examined, are those items on LONDON that contain evidence, contraband, fruits, and instrumentalities of violations of Title 18, United States Code, Section 2421, transporting an individual interstate or foreign commerce for purposes of prostitution and Title 18, United States Code, Section 1956, money laundering. The items to be seized include

1. DNA standard by obtaining four (4) buccal swabs

DISTRICT OF OREGON, ss: AFFIDAVIT OF SCOTT McCOLLISTER

**Affidavit in Support of an Application
Under Rule 41 for a Search Warrant**

I, Scott McCollister, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Detective with the Portland Police Bureau (PPB), assigned as a Task Force Officer (TFO) for the Federal Bureau of Investigation (FBI). My previous investigative assignment was with the Portland Police Human Trafficking Unit (HTU), where my responsibilities included investigating domestic sex trafficking cases and related offenses. I have been a sworn police officer for over twenty-one years. For more than ten years I was assigned as a narcotics investigator with the PPB Drugs and Vice Division with approximately three years as a TFO with the Drug Enforcement Administration (DEA). I have conducted investigations into weapons offenses in violation of Title 18 in addition to violations of Title 21, United States Code, Sections 841 and 846 and related financial crimes. As part of my training, I attended the State of Oregon Department of Public Safety Standards and Training Basic Police Academy, Portland Police Bureau Advanced Academy, and currently hold a Police Officer Basic, Intermediate, and Advanced certification through the Oregon Department of Public Safety Standards and Training. I have participated in no fewer than three hundred investigations regarding the possession, distribution, and manufacture of controlled substances and have been involved in the preparation and execution of at least 250 search warrants for narcotics and other criminal offenses. I have participated in seven federal wire-tap investigations in the District of Oregon and Western District of Washington. In these investigations, I have been the affiant on federal wire-taps, supervised the wire room, conducted wire-directed surveillance, and

Affidavit of Scott McCollister

interviewed individuals who were engaged in drug trafficking.

2. I submit this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the Dodge Charger and the person of Bennie LONDON.

- 2021 Dodge Charger, California license plate 8YAZ411, VIN: 2C3CDXBG9MH632666 (hereinafter, “**Dodge Charger**”);
- LONDON, Bennie Gene, a black male, date of birth: XX/XX/1996, 5’7”, 150 pounds (hereinafter, “**LONDON**”);

as described in Attachment A-1 and A-2 hereto, for evidence, contraband, fruits, and instrumentalities of violations of Title 18, United States Code, Section 2421, transporting an individual with intent to engage in prostitution and Title 18, United States Code, Section 1956, laundering of illegal proceeds (hereinafter the “Target Offenses”), have been committed, are being committed, and will be committed by Bennie LONDON (hereinafter “Target Offenses”). As set forth below, I have probable cause to believe that such property and items, as described in Attachment B-1 and B-2 hereto, including any digital devices or electronic storage media that are currently located within the **Dodge Charger** or on the person of **LONDON**.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

Target Offenses

4. I believe there is probable cause to believe that evidence of the following violations will be found in the places to be searched:

- Title 18 U.S.C. § 2421 prohibits transporting an individual in interstate or foreign commerce with the intent of that individual to engage in prostitution.
- Title 18 U.S.C. § 1956 prohibits conducting a financial transaction knowing that the property involves the proceeds of a specified unlawful activity and with the intent to promote the specified unlawful activity or to conceal and disguise the proceeds of the unlawful activity.

Statement of Probable Cause

5. The Federal Bureau of Investigation (FBI), Portland Police Bureau (PPB) and IRS Criminal Investigation (IRS CI) are investigating Bennie LONDON for sex trafficking a female with the initials of D.A. across the United States and laundering the illicit proceeds. On April 12, 2023, the Hon. Theresa Fricke, U.S. Magistrate Judge for the Western District of Washington, authorized search warrants for LONDON's Vancouver Residence, the **Dodge Charger** and **LONDON**. The application in support of those warrants is attached as **Exhibit A** and incorporated by reference.

6. As part of this ongoing investigation, Investigators obtained geo-location warrants on a cellphone used by LONDON, with an assigned phone number of (971) 427-5977 (hereinafter, "LONDON-5977"). On January 25, 2023, the Hon. Jolie A. Russo authorized a geo-location warrant (23-71) on LONDON-5977. On March 8, 2023, the Hon. Jeffrey Armistead extended the geo-location warrant on LONDON-5977.

7. On April 12, 2023 at approximately 6:30 a.m., LONDON and D.A. loaded items into the **Dodge Charger** and departed the Vancouver Residence (14510 SE 31st Way, Apt. 182, Vancouver, Washington 98683) in the **Dodge Charger**. Geo-location information for LONDON-5977 showed the phone traveling eastbound on Interstate 84 into the Columbia Gorge.

8. Based upon prior surveillance and the investigation as a whole, I believed LONDON was again traveling with D.A. to facilitate the prostitution of D.A. I notified the Oregon State Police that the **Dodge Charger** was traveling eastbound on Interstate 84, occupied by LONDON and D.A., both who had arrest warrants. At approximately 9:15 a.m., Oregon State Police Trooper T. Routson located the **Dodge Charger** in the Chevron gas station and Jacks Mini-Mart located at 3213 Bret Clodfelter Way, The Dalles, Oregon. The trooper contacted **LONDON**, who was asleep in the passenger seat of the **Dodge Charger**. **LONDON** was arrested on his outstanding arrest warrants. Troopers told me D.A. had gone inside the gas station. D.A. was also arrested on her arrest warrants. D.A was in possession of two cellular telephones.

9. **LONDON** asked Troopers to obtain his phone from inside the **Dodge Charger**. At his request, OSP Troopers retrieved the phone from the Dodge Charger and could see GPS displayed on the phone showing a final destination of Salt Lake City, Utah. Troopers were unsure if Investigators would want the phone, so at my request, Troopers placed the phone in airplane mode to preserve evidence. They then placed the phone back inside the **Dodge Charger**. The Troopers towed the vehicle to the PPB Rivergate Vehicle Storage Facility at 7027 NW St. Helens Road, Portland, Oregon where it is located in secure storage.

10. Based upon information listed in Exhibit A, I believe **LONDON** and D.A. are utilizing the **Dodge Charger** to travel to Salt Lake City, Utah to engage in sex trafficking and money laundering. I know that when individuals depart on an out of town trip they possess credit cards used to rent hotel rooms, purchase gas and buy food. I also know that individuals that travel for purposes of prostitution will also possess personal items with them including condoms, clothing indicative of prostitution and firearms (as noted in attached affidavit are tools of the trade for individuals involved in trafficking). Investigators have outlined in the attached affidavit how **LONDON** utilizes CashApp to receive illicit proceeds from D.A. and rent hotel rooms. D.A. utilizes CashApp, under the moniker of Skylar London, to remit payment to James Coxton Martin, a straw-renter of the **Dodge Charger**. I know from my training and experience this is often done to launder the illicit proceeds and continue to promote the ongoing illegal activity.

12. Finally, OSP Troopers confirmed **LONDON's** cellular telephone was in the **Dodge Charger** and D.A.'s cellular telephones were on her person at the time of arrest. Special Agent McGeachy has reviewed phone tolls and identified **LONDON** is in communication with D.A. during their out-of-town trips, which D.A. posts for prostitution. I know from my training and experience, that prostitutes often have in their possession multiple cellular telephones to communicate with johns regarding setting up dates for sex in exchange for money and that prostitutes commonly communicate with their pimp (**LONDON**) regarding their dates, location of dates and money received from these dates.

Electronic Records

13. As described above and in Attachment B-1 and B-2, this application seeks permission to search for records that might be found on the **Dodge Charger (A-1)** and the

person of **Bennie LONDON (B-1)**, in whatever form they are found. One form in which the records will likely be found is data stored on a computer's hard drive, on other storage media, or other digital devices, including cell phones (hereinafter collectively referred to as digital devices). Thus, the warrant applied for would authorize the seizure of electronic storage media or the copying of electronically stored information, all under Rule 41(e)(2)(B).

14. There is probable cause to believe, and I do believe, that records will be stored on a digital device because, based on my knowledge, training, and experience, I know prostitutes often have in their possession multiple cellular telephones to communicate with johns regarding setting up dates for sex in exchange for money and that prostitutes commonly communicate with their pimp regarding their dates, location of dates and money received from these dates.

a. Computer files or remnants of such files can be recovered months or even years after they have been downloaded onto a digital device, deleted, or viewed via the Internet. Electronic files downloaded to a digital device can be stored for years at little or no cost. Even when files have been deleted, they can be recovered months or years later using forensic tools. When a person "deletes" a file on a digital device, the data contained in the file does not actually disappear; rather, that data remains on the digital device until it is overwritten by new data. Therefore, deleted files or remnants of deleted files, may reside in free space or slack space—that is, in space on the digital device that is not currently being used by an active file—for long periods of time before they are overwritten. In addition, a digital device's operating system may also keep a record of deleted data in a "swap" or "recovery" file.

b. Wholly apart from user-generated files, digital devices—in particular, internal hard drives—contain electronic evidence of how a digital device has been used, what it

has been used for, and who has used it. To give a few examples, this forensic evidence can take the form of operating system configurations, artifacts from operating system or application operation, file system data structures, and virtual memory “swap” or paging files. Digital device users typically do not erase or delete this evidence, because special software is typically required for that task. However, it is technically possible to delete this information.

c. Similarly, files that have been viewed via the Internet are sometimes automatically downloaded into a temporary Internet directory or “cache.”

d. Based on actual inspection of other evidence related to this investigation including bank records, CashApp records and online postings, I am aware that digital devices were used to generate, store, and print documents used in the money laundering and promoting prostitution scheme. As noted above, **LONDON** and D.A. had digital devices upon their arrest, and **LONDON**’s was returned to the vehicle. Thus, there is reason to believe that there maybe one or more digital devices currently located in the **Dodge Charger**.

15. As further described in Attachment B-1 and B-2, this application seeks permission to locate not only computer files that might serve as direct evidence of the crimes described on the warrant but also for forensic electronic evidence that establishes how digital devices were used, the purpose of their use, who used them, and when. There is probable cause to believe that this forensic electronic evidence will be on any digital device in the **Dodge Charger**, because, based on my knowledge, training, and experience, I know:

a. Data on the digital device can provide evidence of a file that was once on the digital device but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file). Virtual memory paging systems

can leave traces of information on the storage medium that show what tasks and processes were recently active. Web browsers, email programs, and chat programs store configuration information on the digital device that can reveal information such as online nicknames and passwords. Operating systems can record additional information, such as the attachment of peripherals, the attachment of USB flash storage devices or other external storage media, and the times the digital device was in use. Computer file systems can record information about the dates files were created and the sequence in which they were created.

b. Forensic evidence on a digital device can also indicate who has used or controlled it. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. For example, registry information, configuration files, user profiles, email, email address books, “chat,” instant messaging logs, photographs, the presence or absence of malware, and correspondence (and the data associated with the foregoing, such as file creation and last-accessed dates) may be evidence of who used or controlled the digital device at a relevant time. Further, forensic evidence on a digital device can show how and when it was accessed or used. Such “timeline” information allows the forensic analyst and investigators to understand the chronological context of access to the digital device, its use, and events relating to the offense under investigation. This “timeline” information may tend to either inculcate or exculpate the user of the digital device. Last, forensic evidence on a digital device may provide relevant insight into the user’s state of mind as it relates to the offense under investigation. For example, information on a digital device may indicate the user’s motive and intent to commit a crime (e.g., relevant web searches occurring before a crime indicating a plan to commit the same), consciousness of guilt (e.g., running a “wiping program” to destroy

evidence on the digital device or password protecting or encrypting such evidence in an effort to conceal it from law enforcement), or knowledge that certain information is stored on a digital device (e.g., logs indicating that the incriminating information was accessed with a particular program).

c. A person with appropriate familiarity with how a digital device works can, after examining this forensic evidence in its proper context, draw conclusions about how digital devices were used, the purpose of their use, who used them, and when.

d. The process of identifying the exact files, blocks, registry entries, logs, or other forms of forensic evidence on a digital device that are necessary to draw an accurate conclusion is a dynamic process. While it is possible to specify in advance the records to be sought, electronic evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a digital device is evidence may depend on other information stored on the digital device and the application of knowledge about how a digital device behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.

e. Further, in finding evidence of how a digital device was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a digital device. For example, the presence or absence of counter-forensic programs or anti-virus programs (and associated data) may be relevant to establishing the user's intent.

16. In most cases, a thorough search of the **Dodge Charger** and **LONDON** for information that might be stored on a digital device often requires the seizure of the device and a

later, off-site review consistent with the warrant. In lieu of removing a digital device from the **Dodge Charger** or **LONDON**, it is sometimes possible to image or copy it. Generally speaking, imaging is the taking of a complete electronic picture of the digital device's data, including all hidden sectors and deleted files. Either seizure or imaging is often necessary to ensure the accuracy and completeness of data recorded on the digital device and to prevent the loss of the data either from accidental or intentional destruction. This is true because:

a. As noted above, not all evidence takes the form of documents and files that can be easily viewed on site. Analyzing evidence of how a digital device has been used, what it has been used for, and who has used it requires considerable time, and taking that much time on **Dodge Charger** or **LONDON** could be unreasonable. As explained above, because the warrant calls for forensic electronic evidence, it is exceedingly likely that it will be necessary to thoroughly examine digital devices to obtain evidence. Digital devices can store a large volume of information. Reviewing that information for things described in the warrant can take weeks or months, depending on the volume of data stored, and would be impractical and invasive to attempt on-site.

b. Records sought under this warrant could be stored in a variety of formats that may require off-site reviewing with specialized forensic tools. Similarly, digital devices can be configured in several different ways, featuring a variety of different operating systems, application software, and configurations. Therefore, searching them sometimes requires tools or knowledge that might not be present on the search site. The vast array of hardware and software available makes it difficult to know before a search what tools or knowledge will be required to analyze the system and its data on the **Dodge Charger** or digital device seized from **LONDON**.

However, taking the digital device off-site and reviewing it in a controlled environment will allow its examination with the proper tools and knowledge.

17. In my training and experience, it is likely that the **Dodge Charger** and **LONDON** will contain at least one Apple brand device, such as an iPhone or iPad, and/or device running an Android operating system) because responsive records from Apple pursuant to a subpoena identified **LONDON** with an Apple iCloud account associated to iPhone 7 and an iPhone 12.

18. I know from my training and experience, as well as from information found in publicly available materials that some digital devices offer their users the ability to unlock the device via the use of a fingerprint, thumbprint (collectively, “fingerprint”) in lieu of a numeric or alphanumeric passcode or password. These features are commonly referred to as biometric authentication and their availability is dependent on the model of the device as well as the operating system on the device. If a user enables biometric authentication on a digital device, he or she can register fingerprints to unlock that device.

19. In some circumstances, biometric authentication cannot be used to unlock a device, and a passcode or password must be used instead. These circumstances include: (1) the device has been turned off or restarted; (2) the device has received a remote lock command; (3) too many unsuccessful attempts to unlock the device via biometric authentication are made; (4) when too many hours have passed since the last time the device was unlocked; and (5) when the device has not been unlocked via biometric authentication for a period of time and the passcode or password has not been entered for a certain amount of time. Thus, in the event law enforcement encounters a locked digital device, the opportunity to unlock the device via biometric authentication exists only for a short time.

20. The passcode or password that would unlock digital devices found during the search of the **Dodge Charger** or **LONDON** are not known to law enforcement. Thus, it will likely be necessary to press the fingers of the potential users of the digital devices found during the search of the **Dodge Charger** and **LONDON** to the device's sensor in an attempt to unlock the device for the purpose of executing the search authorized by this warrant. Attempting to unlock the relevant device(s) via biometric authentication is necessary because the government may not otherwise be able to access the data contained on those devices for the purpose of executing the search authorized by this warrant.

21. In my training and experience, the person who is in possession of a device or has the device among his or her belongings at the time the device is found is likely a user of the device. However, in my training and experience, that person may not be the only user of the device whose fingerprints are among those that will unlock the device via biometric authentication, and it is also possible that the person in whose possession the device is found is not actually a user of that device at all. Furthermore, in my training and experience, I know that in some cases it may not be possible to know with certainty who is the user of a given device, such as if the device is found in a common area of a **Dodge Charger** without any identifying information on the exterior of the device. Thus, it will likely be necessary for law enforcement to have the ability to require different individuals in the **Dodge Charger** to press their fingers against the sensor of the device found during the search of the **Dodge Charger** in order to attempt to identify the device's user(s) and unlock the device(s) via biometric authentication. Based on these facts and my training and experience, it is likely that D.A. or LONDON will be

users of the devices and thus that his/her/their fingerprints are among those that are able to unlock the device.

22. I therefore request that the Court authorize law enforcement to position the phone near the faces of D.A. and LONDON, and press the fingers, including thumbs, of D.A. and LONDON found in the **Dodge Charger** to the sensor of the devices found at the **Dodge Charger** for the purpose of attempting to unlock the devices via biometric authentication in order to search the contents as authorized by this warrant.

Nature of Examination

23. Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant for which I apply would permit seizing, imaging, or otherwise copying digital devices that reasonably appear to contain some or all of the evidence described in the warrant and would authorize a later review of the device or information consistent with the warrant. The later review may require techniques, including but not limited to computer-assisted scans of the entire device, that might expose many parts of a hard drive to human inspection in order to determine whether it is evidence described by the warrant.

24. The initial examination of the digital device will be performed within a reasonable amount of time not to exceed 120 days from the date of execution of the warrant. If the government needs additional time to conduct this review, it may seek an extension of the time period from the Court within the original 120-day period from the date of execution of the warrant. The government shall complete this review within 180 days of the date of execution of the warrant. If the government needs additional time to complete this review, it may seek an extension of the time period from the Court.

25. If, at the conclusion of the examination, law enforcement personnel determine that particular files or file folders on the digital device do not contain any data falling within the scope of the warrant, they will not search or examine those files or folders further without authorization from the Court. Law enforcement personnel may continue to examine files or data falling within the purview of the warrant, as well as data within the operating system, file system, software application, etc., relating to files or data that fall within the scope of the warrant, through the conclusion of the case.

26. If an examination is conducted, and the computer and storage media do not contain any data falling within the ambit of the warrant, the government will return the computer and storage media to its owner within a reasonable period of time following the search and will seal any image of the computer and storage media, absent further authorization from the Court.

27. If a computer or storage media contains evidence, fruits, contraband, or is an instrumentality of a crime, the government may retain that computer or storage media as evidence, fruits, contraband, or an instrumentality of a crime or to commence forfeiture proceedings against the computer and storage media and/or the data contained therein.

28. The government will retain a forensic image of the digital device for a number of reasons, including proving the authenticity of evidence to be used at trial, responding to questions regarding the corruption of data, establishing the chain of custody of data, refuting claims of fabricating, tampering, or destroying data, and addressing potential exculpatory evidence claims where, for example, a defendant claims that the government avoided its obligations by destroying data or returning it to a third party.

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DNA Evidence

29. I know from my training, experience, and conversations with Investigators and members of the Oregon State Police Crime Lab that human Deoxyribonucleic Acid (DNA) is often considered evidence which is helpful in furthering criminal investigations. I know DNA is located and/or extracted from items such as hair, blood, sweat, skin cells, and other bodily substances and cellular materials. I know these materials are often left at the scene of the crime or found in trace quantities on objects seized as evidence, to include on firearms. I know these trace quantities of DNA can be collected and their numbers amplified by the OSP Forensic Laboratory. This sample then can be directly compared to a “DNA standard” taken from the suspect.

30. I know from training that DNA is organic hereditary material found in nearly every organism and that DNA is unique for each organism as well as each specific individual. DNA can be found in the cell nucleus as well as cellular mitochondria and is nearly identical throughout every cell in the organism. I know that oral swabs for buccal cells or blood samples, which both contain cellular DNA of the suspected person, can be used to create a DNA profile standard. This standard can then be used to compare against the DNA profile taken from the evidentiary cellular material seized in this case. I believe DNA evidence will more likely than not be found in the Premises.

Conclusion

31. Based on the foregoing, I have probable cause to believe, and I do believe, that Bennie LONDON committed the Target Offenses, and that **contraband/evidence/**
fruits/instrumentalities of those offenses, as described above and in Attachment B-1 and B-2,

are presently located in the **Dodge Charger** or on the person of **Bennie LONDON** which is described above and in Attachment A-1 and A-2. I therefore request that the Court issue a warrant authorizing a search of the **Dodge Charger** as described in Attachment A-1, and the person of **Bennie LONDON** as described in Attachment A-2 for the items listed in Attachment B-1 and B-2 and the seizure and examination of any such items found.

32. Prior to being submitted to the Court, this affidavit, the accompanying application, and the requested search warrant were all reviewed by Assistant United States Attorney (AUSA) Leah K. Bolstad. I was informed that it is AUSA Bolstad's opinion that the affidavit and application are legally and factually sufficient to establish probable cause to support the issuance of the requested warrant.

Scott McCollister
TFO FBI

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at
3:45 ~~a.m.~~/p.m. on April _____, 2023.



HONORABLE JOLIE A. RUSSO
United States Magistrate Judge

UNITED STATES DISTRICT COURT

for the
Western District of Washington

FILED	LODGED
RECEIVED	
Apr 12 2023	
CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY	DEPUTY

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)
TARGET PREMISES, VEHICLE, AND PERSON

Case No. 3:23-mj-05142

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Premises 14510 SE 31st Way, Apt. 182, Vancouver, Washington 98683, VEHICLE 2021 Dodge Charger, California license plate 8YAZ411, VIN: 2C3CDXBG9MH632666, and PERSON, Bennie Gene London, a black male, date of birth: XX/XX/1996, 5'7", 150 pounds located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

18 U.S.C. § 2421
18 U.S.C. § 1956

Offense Description

Transporting an Individual with Intent to Engage in Prostitution
Laundering of Illegal Proceeds

The application is based on these facts:

- ☒ See Affidavit of Scott McCollister, continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.

Applicant's signature

Scott McCollister, Task Force Officer

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
- ☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 04/12/2023

Judge's signature

City and state: Tacoma, Washington

Theresa Fricke, United States Magistrate Judge

Printed name and title

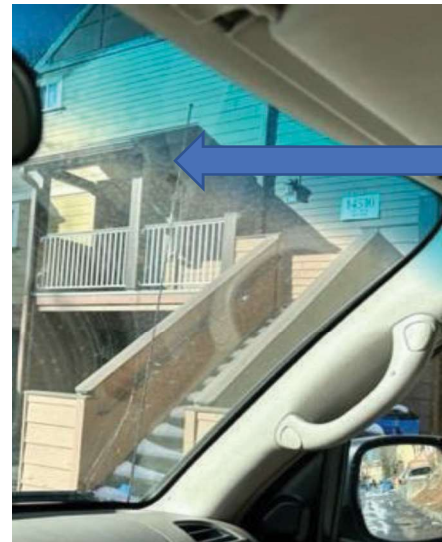
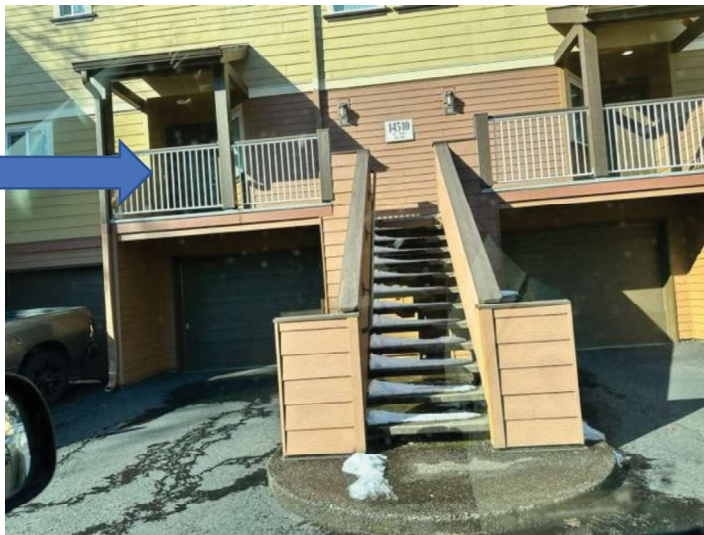
ATTACHMENT A-1

PREMISES TO BE SEARCHED

Based upon the information contained in this affidavit, I am requesting a warrant to search the following location, to include any locked container found on the premises:

14510 SE 31st Way, Apt. 182, Vancouver, Washington 98683

is an apartment complex located in the neighborhood of Fisher's Landing in Vancouver, Washington located on SE 31st Way. Access to SE 31st Way is gained by turning north on SE 31st Way from SE Cascade Park Drive. As you turn north onto SE 31st Way, units 181-188 are located within the third block of apartment buildings from SE Cascade Park Drive. On the outside of the third apartment building is a white sign bearing "14510 31st Way". Underneath the white sign 14510 SE 31st Way is listed "181-188". Apartment 182 is the unit directly to the west of the white sign depicting "14510 SE 31st Way 181-188". To access apartment 182 you walk up a block of steps directly towards the white sign "14510 SE 31st Way" and turn to the west. There is an outside light and underneath the light bears the numbers "182". The bottom half of the apartment complex is dark brown, with white trim separating the middle part of the building and a light brown color on the top third of the apartment complex. The top V frame of the building is dark brown in color with white trim. The front door to unit 182 is depicted with arrows below.



ATTACHMENT A-2
VEHICLE TO BE SEARCHED

Based upon the information contained in this affidavit, I am requesting a warrant to search the following vehicle:

Green 2021 Dodge Charger, California license plate 8YAZ411, VIN: 2C3CDXBG9MH632666



ATTACHMENT A-3
PERSON TO BE SEARCHED

Based upon the information contained in this affidavit, I am requesting a warrant to search the following individual:

Bennie Gene London, black male, date of birth: XX/XX/1996, 5'7", 150 pounds



ATTACHMENT B

Items to Be Seized

The items to be searched for, seized, and examined, are those items on the premises located at 14510 SE 31st Way, Apt. 182, Vancouver, Washington 98683, 2021 Dodge Charger bearing California license plate 8YAZ411 and the person of Bennie Gene London referenced in Attachments A-1 through A-3 that contain evidence, contraband, fruits, and instrumentalities of violations of Title 18, United States Code, Section 2421, transporting an individual interstate or foreign commerce for purposes of prostitution and Title 18, United States Code, Section 1956, money laundering. The items to be seized cover the period of June 1, 2020 through the date of the execution of the search warrant.

1. The items referenced above to be searched for, seized, and examined are as follows:

a. Books, records, receipts, notes, ledgers, diaries, accounting, postings, communication and financial transactions relating to promoting and facilitating prostitution, prostitution and money laundering;

b. Personal books and papers reflecting names, addresses, telephone numbers, articles of clothing, photos and other contacts for the purpose of promoting or facilitating prostitution;

c. Financial profits, proceeds and instrumentalities of facilitating and promoting prostitution, prostitution and money laundering, including U.S. Currency, virtual currency including Bitcoin, Coinbase account records, bitcoin wallets, bitcoin transactions, prepaid debit cards, credit cards, CashApp cards, PayPal cards;

d. Books, records, receipts, notes, ledgers, and other documents relating to financial transaction, communications related to facilitating and promoting prostitution, prostitution and money laundering, and evidence of the use of individuals to disguise profits, vehicles, apartments, vehicle purchase documentation, rental vehicles, property records, vehicle titles for the time period of June 1, 2020 to the present;

e. Firearms and other dangerous weapons, ammunition, magazines and body armor;

f. Personal books and papers reflecting names, addresses, telephone numbers, articles of clothing, photos and other contacts including identification data relating to the promoting and facilitating prostitution, prostitution and money laundering for the time period of June 1, 2020 to the present;

g. Financial records and personal objects relating to facilitating prostitution and prostitution income, money laundering and expenditures of money and wealth, to-wit: money orders, wire transfer records, cashier's checks and receipts, checks, bank account records, passbooks, tax records, W-2's, 1099's, safe deposit box keys and records, checkbooks, title files, vehicle purchases and check registers, as well as items of unexplained wealth including precious metals/jewelry such as gold, silver, diamonds, Rolex watches, earrings, pendants, necklaces, rings, etc., designer shoes, designer clothing, designer luggage including brands such as Gucci, Versace, and Luis Vuitton for the time period of June 1, 2020 to the present;

h. Items of personal property that tend to identify the person(s) in residence, occupancy, control, or ownership of the premises, including canceled mail, deeds, leases, rental agreements, photographs, personal telephone books, diaries, utility and telephone bills, statements, identification documents, and keys;

i. Documents indicating travel in interstate and foreign commerce, to include

airline tickets, notes and travel itineraries; airline schedules; bills; charge card receipts; hotel, motel, and car rental statements; correspondence with travel agencies and other travel-related businesses; airline, rent-a-car, and hotel frequent flier or user cards and statements; passports and visas; telephone bills; photographs of foreign locations; and papers relating to domestic and international travel for the time period of June 1, 2020 to the present;

j. Cellular telephones, computers and other electronic storage/communication devices capable of storing data to access the internet, book transportation services online, book hotel reservations, access e-mail, send and receive text messages, store records of financial transactions and debts, access online bank records that constitute evidence or instrumentality of facilitating and promoting prostitution, prostitution and money laundering.

1 County of Clark)
 2) ss:
 3 State of Washington)
 4

5 I, Scott McCollister, being duly sworn, do hereby depose and state as follows:

6 **AFFIANT BACKGROUND**

7 1. I am a Detective with the Portland Police Bureau (PPB), assigned as a Task Force
 8 Officer (TFO) for the Federal Bureau of Investigation (FBI). My previous investigative
 9 assignment was with the Portland Police Human Trafficking Unit (HTU), where my
 10 responsibilities included investigating domestic sex trafficking cases and related offenses. I have
 11 been a sworn police officer for over twenty-one years. For more than ten years I was assigned as
 12 a narcotics investigator with the PPB Drugs and Vice Division with approximately three years as
 13 a TFO with the Drug Enforcement Administration (DEA). I have conducted investigations into
 14 weapons offenses in violation of Title 18 in addition to violations of Title 21, United States
 15 Code, Sections 841 and 846 and related financial crimes. As part of my training, I attended the
 16 State of Oregon Department of Public Safety Standards and Training Basic Police Academy,
 17 Portland Police Bureau Advanced Academy, and currently hold a Police Officer Basic,
 18 Intermediate, and Advanced certification through the Oregon Department of Public Safety
 19 Standards and Training. I have participated in no fewer than three hundred investigations
 20 regarding the possession, distribution, and manufacture of controlled substances and have been
 21 involved in the preparation and execution of at least 250 search warrants for narcotics and other
 22 criminal offenses. I have participated in seven federal wire-tap investigations in the District of
 23 Oregon and Western District of Washington. In these investigations, I have been the affiant on
 24 federal wire-taps, supervised the wire room, conducted wire-directed surveillance, and
 25 interviewed individuals who were engaged in drug trafficking.

26 **PURPOSE OF AFFIDAVIT**

27 2. I submit this affidavit in support of an application under Rule 41 of the Federal
 28 Rules of Criminal Procedure for a warrant to search the premises:

- 14510 SE 31st Way, Apt. 182, Vancouver, Washington 98683 (hereinafter,
 “Vancouver Residence” or the “Premises”)

Affidavit of Scott McCollister - 1
 USAO No. 2023R00394

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- 2021 Dodge Charger, California license plate 8YAZ411, VIN: 2C3CDXBG9MH632666 (hereinafter, “**Dodge Charger**”);
- LONDON, Bennie Gene, a black male, date of birth: XX/XX/1996, 5’7”, 150 pounds (hereinafter, “**LONDON**”)

as described in Attachment A-1 through A-3 hereto, for evidence, contraband, fruits, and instrumentalities of violations of Title 18, United States Code, Section 2421, transporting an individual with intent to engage in prostitution, Title 18, United States Code, and Title 18, United States Code, Section 1956, laundering of illegal proceeds (hereinafter the “**Target Offenses**”), have been committed, are being committed, and will be committed by Bennie LONDON. As set forth below, I have probable cause to believe that such property and items, as described in Attachment B hereto, are currently located at **Vancouver Residence, Dodge Charger** and on the person, **LONDON**.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

TARGET OFFENSES

4. I believe there is probable cause to believe that evidence of the following violations will be found in the places to be searched:

- Title 18 U.S.C. § 2421 prohibits transporting an individual in interstate or foreign commerce with the intent of that individual to engage in prostitution.
- Title 18 U.S.C. § 1956 prohibits conducting a financial transaction knowing that the property involves the proceeds of a specified unlawful activity and with the intent to promote the specified unlawful activity or to conceal and disguise the proceeds of the unlawful activity.

STATEMENT OF PROBABLE CAUSE¹

4. The Federal Bureau of Investigation (FBI), Portland Police Bureau (PPB) and Internal Revenue Service Criminal Investigation (IRS CI) (hereinafter referred to collectively as “Investigators”) are investigating Bennie LONDON for sex trafficking a female with the initials of D.A. across the United States in violation of Title 18, United States Code, Section 2421. As detailed later in this affidavit, D.A. receives monies from her prostitution activities via CashApp, which she transfers to LONDON’s CashApp account. D.A.’s CashApp account is believed to use the display name of “Skylar London”, which is designed to conceal and disguise the source of the funds. LONDON, in turn, receives CashApp transfers from Skylar London using his account with the display name “Billy Bob”. I believe transmitting illicit proceeds via CashApp, using display names not in the name of the actual people, is designed to conceal and disguise the true source and ownership of the illicit sex trafficking proceeds. As outlined below, LONDON uses the monies from his CashApp account to purchase hotel rooms and ride share services in cities across the United States, which are the same cities D.A. is soliciting prostitution through online escort ads, thus promoting the ongoing illegal activity.

¹ Based on my training and experience, I use the following technical terms to convey the following meanings:

a. *IP address.* The Internet Protocol address (or simply “IP address”) is a unique numeric address used by digital devices on the Internet. Every digital device attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that digital device may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some digital devices have static—that is, long-term—IP addresses, while other digital devices have dynamic—that is, frequently changed—IP addresses.

b. *Internet.* The Internet is a global network of digital devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

c. *Storage medium.* A storage medium is any physical object upon which data can be recorded. Examples include hard disks, RAM, floppy disks, flash memory, CD-ROMs, and other magnetic or optical media.

Affidavit of Scott McCollister - 3
USAO No. 2023R00394

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1 5. LONDON has a history of possessing firearms, with three gun-related convictions
2 (2012, 2016 and 2019). Furthermore, individuals involved in sex trafficking possess firearms as
3 tools of the trade, used to protect their assets, which includes both the prostitute and their cash.

4 6. LONDON is a convicted felon and prohibited from possessing firearms.
5 LONDON has felony convictions in the State of Oregon for Unlawful Use of a Weapon (2012)
6 for which he was sentenced to 60 months in prison, Attempt Assault in the First Degree and
7 Unlawful Use of a Weapon (2016) for which he was sentenced to 32 months in prison, and Felon
8 in Possession of a Firearm (2019). LONDON has a non-extraditable warrant out of Hastings,
9 Minnesota for Larceny. On January 7, 2023, LONDON was indicted in Multnomah County,
10 Oregon for Aggravated Theft I, four (4) counts of Theft 1 and Computer Crime. LONDON has
11 an active arrest warrant out of Multnomah County from the January 7, 2023 indictment.

12 7. D.A. has a criminal history, including State convictions for Theft 1st Degree and
13 2nd Degree (2013) (Oregon), Probation Violation (2015) (Idaho), Grand Theft (2017)
14 (California), Conspiracy to Commit Crime and Grand Larceny (2019) (Nevada) and Theft 2nd
15 Degree (2020) (Iowa). On June 24, 2022, Chandler Police Department (Arizona) arrested
16 Keyasia Woods under the identical FBI number of D.A. for misdemeanor crimes of Shoplifting,
17 Prescription Drugs Possession/Use and Prescription Possession Use/Misbranded. At this time, I
18 don't know if it was Woods who was arrested or D.A.; however, the name Keyasia Woods is
19 relevant to this investigation as will be outlined below.

20 8. As will be outlined in further detail below, Investigators believe Bennie
21 LONDON and D.A. reside at the **Vancouver Residence**, with the lease is held in the name of
22 Keyasia Woods.

23 9. Investigators have obtained multiple warrants for geo-location data on a
24 cellphone used by LONDON. The phone number is assigned (971) 427-5977 (hereinafter,
25 "LONDON-5977"). On January 25, 2023, the Hon. Jolie A. Russo authorized a geo-location
26 warrant (23-71) on LONDON-5977. On March 8, 2023, the Hon. Jeffrey Armistead extended the
27 geo-location warrant on LONDON-5977. On March 24, 2023, the Hon. Jeffrey Armistead
28 authorized search warrants on LONDON and D.A.'s Instagram accounts (23-mc-00248-A&B),
which the result are currently pending.

10. In furtherance of this ongoing investigation, I now seek a warrant to search the **Vancouver Residence, Dodge Charger** and Bennie **LONDON**.

A. Wells Fargo Bank Account for LONDON and D.A.

11. Portland Police Bureau Detective Joseph Cox conducted an investigation into LONDON for Aggravated Theft, Theft 1 and Computer Crimes pursuant to LONDON's involvement in fraudulently obtaining State of Oregon Unemployment benefits (January 7, 2023 indictment). During Detective Cox's investigation, he obtained Wells Fargo Bank records for the joint account of LONDON and D.A., which identified suspicious cash deposits in cities across the United States.

12. IRS-CI Special Agent McGeachy conducted a review of the Wells Fargo Bank records and noted on or about September 22, 2020, D.A. and LONDON opened a joint Wells Fargo Bank checking account ending in 7331. On the signature card, D.A. listed her phone number as (720) 440-3980 (hereinafter, "D.A.-3980") and LONDON listed his phone number (702) 498-1681 (hereinafter, "LONDON-1681").² The Wells Fargo Bank account was closed on or about August 16, 2021.

13. During Special Agent McGeachy's review of the Wells Fargo Bank account ending in 7331, he noted small deposits from cities around the United States including Allentown, Pennsylvania, Missoula Montana, Bozeman, Montana, Des Moines, Iowa, Westminster, Colorado, Virginia Beach, Virginia, Highland Spring, Virginia, Anchorage, Alaska, Fairbanks, Alaska, Chicago, Illinois, Princeton, New Jersey, Portland, Oregon and Vancouver, Washington. The cash deposits typically appeared to be in small, even dollar amounts that were quickly followed by charges at hotels, restaurants, and transportation services (Greyhound, Amtrak and airlines). Special Agent McGeachy was able to review several ATM videos of these cash deposits that appear to show an unknown black female making cash

² At this time investigators have been unable to determine whom the phone subscribers were for D.A.-3980 or LONDON-1681 (at the time the Wells Fargo Bank account was opened on September 22, 2020) due to the fact the phones appear to have been turned off and have been reactivated under new subscribers.

1 deposit(s) into the bank account. The following is an example of the cash deposits to the joint
 2 Wells Fargo Bank account ending in 7331:

5	Date	Description	Location	Deposit Amount
6	10/1/2020	ATM Deposit	Lloyd Center	\$300.00
7			SE 103rd & Washington	
8	10/7/2020	ATM Deposit	PDX	\$110.00
9	12/7/2020	ATM Deposit	Bozeman, MT	\$600.00
10	12/21/2020	ATM Cash Deposit	Westminster, CO	\$160.00
11	1/4/2021	ATM Cash Deposit	Lloyd Center	\$330.00
12	1/4/2021	ATM Cash Deposit	Lloyd Center	\$180.00
13	1/4/2021	ATM Cash Deposit	Vancouver, WA	\$207.00
14	1/7/2021	ATM Cash Deposit	Virginia Beach, VA	\$200.00
15	1/12/2021	ATM Cash Deposit	Washington, DC	\$37.00
16	1/13/2021	ATM Cash Deposit	Vienna, VA	\$120.00
17	1/19/2021	ATM Cash Deposit	Richmond, VA	\$100.00
18	1/19/2021	ATM Cash Deposit	Highland Spring, VA	\$380.00
19	2/1/2021	ATM Cash Deposit	Portland, OR	\$400.00
20	2/1/2021	ATM Cash Deposit	Anchorage, AK	\$200.00
21	2/1/2021	ATM Cash Deposit	Anchorage, AK	\$32.00
22	2/1/2021	ATM Cash Deposit	Anchorage, AK	\$169.00
23	2/1/2021	ATM Cash Deposit	Anchorage, AK	\$200.00
24	2/2/2021	ATM Cash Deposit	Portland, OR	\$300.00
25	2/3/2021	ATM Cash Deposit	Fairbanks, AK	\$300.00
26	2/4/2021	ATM Cash Deposit	Anchorage, AK	\$200.00
27	2/4/2021	ATM Cash Deposit	Anchorage, AK	\$100.00
28	2/5/2021	ATM Cash Deposit	Anchorage, AK	\$300.00
	2/5/2021	ATM Cash Deposit	Anchorage, AK	\$120.00

Affidavit of Scott McCollister - 6
 USAO No. 2023R00394

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1	2/8/2021	ATM Cash Deposit	Anchorage, AK	\$100.00
2	2/8/2021	ATM Cash Deposit	Anchorage, AK	\$250.00
3	2/10/2021	ATM Cash Deposit	Anchorage, AK	\$100.00
4	2/10/2021	ATM Cash Deposit	Anchorage, AK	\$17.00
5	2/11/2021	ATM Cash Deposit	Anchorage, AK	\$220.00
6	2/12/2021	ATM Cash Deposit	Seatac, WA	\$600.00
7	2/16/2021	ATM Cash Deposit	Chicago, IL	\$200.00
8	2/16/2021	ATM Cash Deposit	Chicago, IL	\$100.00
9	2/22/2021	ATM Cash Deposit	Niles, IL	\$300.00
10	2/22/2021	ATM Cash Deposit	King of Pruss, PA	\$75.00
11	2/24/2021	ATM Cash Deposit	Princeton, NJ	\$140.00
12	2/24/2021	ATM Cash Deposit	Princeton, NJ	\$60.00
13	2/24/2021	ATM Cash Deposit	Princeton, NJ	\$400.00
14	3/10/2021	ATM Cash Deposit	Portland, OR	\$200.00
15	4/12/2021	ATM Cash Deposit	Bozeman, MT	\$200.00
16	4/12/2021	ATM Cash Deposit	Missoula, MT	\$40.00
17	4/14/2021	ATM Cash Deposit	Inglewood, CA	\$200.00

14. Special Agent McGeachy also conducted a review of the expenditures from the joint Wells Fargo Bank account ending in 7331 and noted a large number of hotel purchases. The hotel purchases are consistent with cash deposits made into the Wells Fargo Bank account ending in 7331 from cities around the United States, used to facilitate prostitution-related activity.

			Withdrawal
Date	Description	Location	Amount
10/8/2020	Holiday Inn	Bethlehem, PA	\$156.11
10/8/2020	Hampton Inn	King of Pruss, PA	\$13.50
12/3/2020	Priceline - Holiday Inn		\$94.97
12/4/2020	Priceline - Holiday Inn		\$94.97

Affidavit of Scott McCollister - 7
USAO No. 2023R00394

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1	12/7/2020	Priceline - Holiday Inn		\$111.97
2	12/7/2020	Priceline - Holiday Inn		\$94.97
3	12/7/2020	Priceline - Holiday Inn		\$106.97
4		Priceline - Hampton		
5	12/21/2020	Inn		\$65.98
6		Priceline - Hampton		
7	12/21/2020	Inn		\$65.98
8		Priceline - Residence		
9	12/21/2020	Inn		\$81.96
10	12/23/2020	Luxor Hotel	Las Vegas, NV	\$29.97
11	12/24/2020	Luxor Hotel	Las Vegas, NV	\$39.68
12		Priceline - Red Lion		
13	1/4/2021	Hotel		\$85.43
14	1/7/2021	Priceline - Country Inn		\$77.97
15	1/11/2021	Priceline - Holiday Inn		\$83.97
16	1/11/2021	Priceline - Delta Hotel		\$102.46
17		Priceline - Hyatt		
18	1/13/2021	Regency	Boston, MA	\$94.96
19	1/14/2021	Hyatt Regency	Boston, MA	\$53.18
20	1/19/2021	Hawthorn Suites	Vienna, VA	\$112.00
21	1/19/2021	Priceline – Doubletree		\$82.97
22	1/20/2021	Priceline – Aloft		\$73.97
23	1/21/2021	Aloft by Marriott	Columbia, SC	\$50.00
24	2/1/2021	Hyatt Place	Anchorage, AK	\$115.58
25	2/1/2021	Priceline - Hyatt Place		\$125.97
26	2/2/2021	Hyatt Place	Anchorage, AK	\$124.54
27	2/4/2021	Hyatt Place	Anchorage, AK	\$131.06
28	2/4/2021	Priceline - Hyatt Place		\$128.52
	2/5/2021	Priceline - Hyatt Place		\$124.97
	2/8/2021	Priceline - Four Points		\$90.97

Affidavit of Scott McCollister - 8
 USAO No. 2023R00394

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1	2/8/2021	Priceline – Sheraton		\$135.97
2	2/8/2021	Priceline - Hyatt House		\$128.97
3	2/9/2021	Priceline - Hyatt House		\$128.97
4	2/10/2021	Priceline - Hyatt House		\$128.97
5	2/11/2021	Priceline - Hyatt House		\$128.97
6	2/12/2021	Priceline - Hyatt House		\$128.97
7	2/16/2021	Priceline – Radisson		\$93.97
8	2/16/2021	Priceline – Renaissance		\$108.96
9	2/16/2021	Priceline – Renaissance		\$114.97
10	2/17/2021	Priceline - Hyatt Place		\$67.98
11	2/18/2021	Priceline - Hyatt Place		\$68.96
12		Priceline - Hampton		
13	2/22/2021	Inn		\$73.96
14	2/23/2021	Hampton Inn	King of Pruss, PA	\$28.00
15		Priceline - Hampton		
16	2/23/2021	Inn		\$81.66
17	2/24/2021	Hampton Inn	King of Pruss, PA	\$13.00
18	2/24/2021	Priceline – Doubletree		\$92.97
19	2/25/2021	Double Tree	Philadelphia, PA	\$72.16
20	2/26/2021	Hampton Inn	NJ	\$21.5
21		Priceline - Hyatt		
22	2/26/2021	Regency		\$86.97
23	3/11/2021	Red Lion Hotel	Portland, OR	\$108.10
24	4/12/2021	Priceline – Courtyard		\$141.32
25	4/12/2021	Courtyard	Missoula, MT	\$4.50
26	4/12/2021	Priceline – Staybridge		\$104.96
27	4/15/2021	Red Lion Hotel	Portland, OR	\$8.77

15. Special Agent McGeachy noted 11 different charges to the joint Wells Fargo Bank ending in 7331 to “Alook Media Amsterdam NLD” flagged as an international charge for

Affidavit of Scott McCollister - 9
USAO No. 2023R00394

UNITED STATES ATTORNEY
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(206) 553-7970

1 amounts varying from \$1.40 to \$9.86. Special Agent McGeachy was unable to definitively
 2 identify the exact merchant for “Alook Media Amsterdam NLD” via a Google search; however,
 3 he located the website <https://scamcharge.com/c/col-media-amsterdam-nld> listed as “COL Media
 4 Amsterdam NLD” that notated the charge as a company offering escort services of women in
 5 cities around the world. Thus, I believe it’s a high probability the 11 charges to Alook Media
 6 Amsterdam NLD were made for posting escort advertisements on escort websites.

7 **B. D.A. Posts to Escort Websites**

8 16. Based on the manner of cash deposits by the unknown female(s) into the joint
 9 Wells Fargo Bank account of D.A. and LONDON, Special Agent McGeachy requested a query
 10 to identify online escort advertisements using the phone numbers listed on the signature cards for
 11 the Wells Fargo Bank account for D.A. and LONDON.

12 17. Special Agent McGeachy received information regarding several escort ads
 13 posted to escort websites using the D.A.-3980 number, including a series of ads posted on or
 14 around March 20, 2022 on AdultLook.com using the name “Mia”.³ I know AdultLook.com is a
 15 website used to post escort advertisements, soliciting prostitution. The locations listed in the
 16 “Mia” escort ad were Tyson’s Corner, Virginia and Boston, Massachusetts. The ad listed “New
 17 to area looking for fun I’m her” and prices that ranged from \$150 Euro for 15 minutes to \$400
 18 Euro for one hour (in call) and \$170 for 15 minutes for outcall services up to \$450.00. I know the
 19 post to be consistent with prostitution services and the prices to receive those services.

20 18. During Special Agent McGeachy’s review of the Wells Fargo Bank ending in
 21 7331 account for D.A. and LONDON, he noted over \$4,000 in money transfers into the bank
 22 account from an individual listed as “Mia”. Furthermore, there were eight transfers out of the
 23 Wells Fargo Bank account ending in 7331 to CashApp for a credit posted to “Mia”. I believe this
 24 is evidence that D.A. is posting prostitution ads to escort websites around the United States,
 25 receiving cash from the illicit activity and/or monies via CashApp under the alias of “Mia” and
 26 depositing the funds into the joint Wells Fargo Bank account for D.A. and LONDON. Thus, I
 27 believe the deposits are being made in conjunction with D.A.-3980 being listed as the contact

28 ³ LONDON also used D.A.-3980 as his listed home contact phone number for a US Bank
 Reliacard.

1 number on escort websites, which I believe is strong evidence of LONDON's involvement in
2 trafficking D.A.

3 19. Special Agent McGeachy also requested a query for LONDON-1681, to
4 determine if LONDON-1681 (from Signature Card) has been used as a contact number on escort
5 advertisements. Special Agent McGeachy noted different escort ads on AdultLook.com depicting
6 a black female escort with the name "Alexiss Baby". Special Agent McGeachy found that the
7 ads were posted for locations in Portland, Oregon, San Jose, California, Allentown Pennsylvania
8 and Philadelphia, Pennsylvania during October 2020. Special Agent McGeachy reviewed the
9 photographs of the female posted to AdultLook.com using the name "Alexiss Baby" and
10 compared it to the photograph of the female posted under the name of "Mia" and noted a
11 distinctive star tattoo on the chest in each posting. This suggests to me the same female, whom I
12 believe to be D.A, posted escort ads under different alias names on prostitution websites.

13 20. Furthermore, Special Agent McGeachy reviewed responsive records from
14 PayPal that noted D.A. opened a PayPal account under the name of Alexiss West. As noted in
15 the chart above, there are hotel charges to LONDON and D.A.'s Wells Fargo Bank account in
16 the Pennsylvania area on or about October 8, 2020, consistent with the October prostitution ads
17 in Pennsylvania using the name of "Alexiss Baby". I believe this is further evidence that Bennie
18 LONDON, using the phone LONDON-1681, is posting D.A. for prostitution and receiving the
19 illicit proceeds through the joint Wells Fargo Bank account ending in 7331. Once LONDON
20 and/or D.A. receive illicit proceeds into the Wells Fargo Bank account ending in 7331 they
21 purchase hotel rooms in various cities in order to continue to promote the ongoing illicit activity.

22 **C. LONDON Receives Monies via CashApp from Alexiss West and Skylar London**

23 21. Special Agent McGeachy reviewed responsive records from CashApp for the
24 time period of July 2021 to January 4, 2023 for the Bennie LONDON account ending in 8mwj.
25 LONDON listed his phone number as (971) 977-3536 (hereinafter, "LONDON-3536") and his
26 display name as "Billy Bob". I know from my experience that utilizing a display name different
27 from your legitimate name allows your legitimate name to be concealed on transactional data
28 such as bank statements.

29 22. During Special Agent McGeachy's review of CashApp account ending in 8mwj,
30 he noted the first CashApp deposit was from "Alexiss West" paying "Billy Bob" \$10 for gas. As

1 previously stated, in October 2020, LONDON-1681 was the contact number on an escort website
 2 with the female's posted name of "Alexiss Baby". As noted above, PayPal records indicated
 3 D.A. opened a PayPal account under the name of "Alexiss West". Thus, I believe Alexiss West
 4 is most likely one of the CashApp display names for D.A., used to conceal and disguise her true
 5 identity. Furthermore, Special Agent McGeachy noted that LONDON-1681 was used as the
 6 contact number to post a female to a prostitution website using the name of "Alexiss", which is
 7 also the first name of a CashApp account that is also transmitting monies to LONDON. I know
 8 from my training and experience, that prostitutes that post to escort websites frequently use a
 9 unique name (not their legitimate name) and will use payments apps such as CashApp, setup in
 10 that unique name to receive payment from "johns". I know this is done to conceal their true
 identity from both the "john" and law enforcement.

11 23. During Special Agent McGeachy's review of LONDON's CashApp account, he
 12 noted dozens of transactions between D.A. and "Billy Bob", which I believe to be consistent
 13 with the long-term ongoing relationship of LONDON acting as her pimp and D.A. working as a
 14 prostitute. As stated above, D.A. used the Alexiss West account to transfer money to LONDON
 15 and receive money from LONDON. On December 7, 2022, Investigators noted the final
 16 CashApp transaction between the Alexiss West account and LONDON's CashApp account.⁴
 17 However, starting on December 8, 2022, LONDON began receiving monies deposited to his
 18 CashApp account from an individual listed as "Skylar London". From December 8, 2022
 19 through January 24, 2023 (CashApp records for Skylar London go through March 7, 2023)
 20 Skylar London paid "Billy Bob" thirty (30) separate times totaling \$4,006 in varying amounts
 21 from \$6.00 to \$300.00. Conversely, LONDON using the moniker "Billy Bob" paid Skylar
 22 London via CashApp nine (9) separate times totaling \$1,204 from December 23, 2022 through
 23 January 23, 2023. Based on Special Agent McGeachy's review of LONDON's CashApp account
 24 ending in 8mwj, it appears that on or about January 25, 2023 LONDON stopped using his
 25 CashApp account for an unknown reason. As shown later in this affidavit, online escort
 26 advertisements in the name Alexiss Baby and Skylar London appear to depict the same person. I
 27 believe D.A. stopped using the Alexiss West account and began using the Skylar London

28 ⁴ It should be noted that an individual can have more than one CashApp account.

1 account, to transfer monies to LONDON. I believe Skylar London is most likely one of the
 2 CashApp display names for D.A., changing the username to conceal and disguise her true
 3 identity.

4 **D. Bennie London is User of LONDON-5977**

5 24. Responsive data from subpoenas to CashApp, Apple and Lyft identified
 6 LONDON as the user of (971) 977-3536 (hereinafter, "LONDON-3536"), which has been
 7 discontinued. T-Mobile phone records listed the subscriber for LONDON-3536 as Ladonna
 8 Smith at 2418 NE Saratoga Street, Portland, Oregon 97211. Service discontinued on or about
 9 August 18, 2022.

10 25. On January 3, 2023, Investigators learned that LONDON contacted Multnomah
 11 County Parole and Probation from phone number (971) 427-5977 (hereinafter, "LONDON-
 12 5977"). In ZETX, an online portal that assists law enforcement in identifying subscribers and
 13 carriers of phone numbers, LONDON-5977 also shows to be subscribed in the name of Ladonna
 14 Smith with the phone carrier was also listed as T-Mobile. The account was activated on August
 15 18, 2022 (same day LONDON-3536 was discontinued). Special Agent McGeachy conducted a
 16 common call analysis of phone toll records for a sampling of the top phone contacts for
 17 LONDON-3536 in an attempt to ascertain if LONDON reached out to his frequent contacts once
 18 he obtained his new phone number (LONDON-5977). Special Agent McGeachy confirmed
 19 LONDON did so. Based on the above, I believe LONDON is the user of LONDON-5977 and
 20 pertinent aspects of both phone toll analysis and geo-location data for LONDON-5977 will be
 21 outlined below.

22 **E. Skylar London Posted on Adult Escort Websites**

23 26. Special Agent McGeachy reviewed information from SkiptheGames.com and
 24 Megapersonals.eu, two online escort websites, that identified escort ads for a female listing the
 25 name "Skylar London", using phone number (757) 750-5186 (hereinafter, "Skylar-5186"). The
 26 ads were posted in cities across the United States including Harrisburg, Pennsylvania, Bozeman,
 27 Montana, Allentown, Pennsylvania, Philadelphia, Pennsylvania, Atlantic City, New Jersey,
 28 Boston, Massachusetts and Richmond, Virginia between August 2022 and January 2023.⁵ ZETX

⁵ Skip the Games and Megapersonals are online marketplaces to purchase sex.

1 identified Skylar-5186 as a Text Now phone number ported through Inteliquent with no listed
2 subscriber. I know it is common for persons involved in prostitution to use Text Now, which is
3 an app to conduct anonymous text messaging. I know Text Now is commonly used to thwart
4 efforts by law enforcement in identifying the prostitute and concealing the true identity of the
5 prostitute from the “johns”. Special Agent McGeachy noted LONDON-5977 had four contacts
6 with Skylar-5186, which I believe is strong evidence that LONDON is associated with and
7 contacting D.A. on Skylar-5186. As stated above Skylar-5186 is the contact number on
8 prostitution websites and I believe LONDON is promoting prostitution-related activities in
9 furtherance of their ongoing prostitution and money laundering activities.

10 27. Special Agent McGeachy reviewed a January 23, 2023 escort ad posted to
11 Adultsearch.com. The ad listed the name “Skylar” and was posted in Philadelphia, Pennsylvania
12 and listed a contact number as (503) 250-4315 (hereinafter, “Skylar-4315”). Special Agent
13 McGeachy found that LONDON-5977 had over 35 contacts with Skylar-4315 the thirty days
14 prior with the last contact on January 18, 2023 (toll records went through January 19, 2023). I
15 believe is further evidence of their ongoing promoting prostitution and money laundering
16 activity.

17 **F. LONDON Rents Hotels for D.A.**

18 **i) Bozeman, Montana**

19 28. Special Agent McGeachy noted Skylar London had prostitution postings
20 December 10, 2022 through December 12, 2022 on “skipthegames.com” in Bozeman, Montana.
21 During his review of LONDON’s CashApp account, Special Agent McGeachy identified a
22 December 11, 2022 hotel purchase at the Hampton Inn, Bozeman, Montana.

23 29. Special Agent McGeachy reviewed responsive data pursuant to subpoenas issued
24 to Homewood Suites located at 1023 Baxter Lane, Bozeman, Montana and the Hampton Inn
25 located at 75 E. Baxter Lane, Bozeman, Montana. LONDON rented a hotel room at the
26 Homewood Suites on December 10, 2022 and checked out on December 11, 2022 for a total
27 expense of \$137.40. LONDON then rented a hotel room from the Hampton Inn on December 11,
28 2022 and checked out on December 12, 2022 for a total price of \$116.48. I believe LONDON
paying for the hotel rooms with his CashApp account, in the Montana city that D.A. is posted as
an escort, is consistent with promoting the ongoing illegal activity of sex trafficking.

1 **ii) Philadelphia, Pennsylvania**

2 30. On February 16, 2023, D.A. was posted to Skipthegames.eu in Philadelphia, PA
 3 for “two days only”. The escort ad listed sexual services, used the photographs of D.A., and the
 4 contact number of Skylar-5186. The ad indicated they would accept “incall and outcall” clients
 5 and acceptable payment methods were listed as cash or CashApp. I know outcall is when a
 6 prostitute will travel to the location of the “john”. Conversely, incall is when the “john” travels to
 7 the location provided by the escort. Special Agent McGeachy reviewed responsive data from
 8 LONDON’s Hilton Honors account, which showed LONDON rented two hotel rooms on
 9 February 14, 2023 at the Hilton Full Service/Suites in Philadelphia, Pennsylvania and checked
 10 out on February 15, 2023. On February 15, 2023, LONDON rented two additional hotel rooms
 11 at the Hampton Inn in King of Prussia, Pennsylvania and checked out on February 16, 2023. I
 12 believe LONDON renting multiple hotel rooms at the same hotel is consistent with reserving one
 13 hotel room to conduct prostitution activities and the second hotel room for LONDON to stay and
 14 monitor the illicit activity.

14 **G. Geo-Location Warrant for LONDON-5977 Shows Extensive Travels**

15 31. Special Agent McGeachy reviewed historical geo-location information for
 16 LONDON-5977 provided by T-Mobile for the time period of August 22, 2020 through January
 17 25, 2023, pursuant to search warrant 23-mc-71 (District of Oregon). The requested information
 18 showed LONDON-5977 in the area of Richmond, Virginia on August 22, 2022. For the next
 19 three months, LONDON-5977 travelled around the East Coast, showing to be in the area of
 20 Gaithersburg, Maryland, Alexandria, Virginia, King of Prussia, Pennsylvania, New York, New
 21 York, Revere, Massachusetts, Hartford, Connecticut, Atlantic City, New Jersey, Philadelphia,
 22 Pennsylvania until its return to Portland, Oregon on or about November 21, 2022. As noted
 23 above, Skylar London was posted on adult escort websites in many of these same cities that
 24 LONDON-5977 was located.

25 32. On December 6, 2022, LONDON-5977 departed from Portland, Oregon and
 26 traveled to Salt Lake City, Utah, Las Vegas, Nevada, Bozeman, Montana and Scottsdale,
 27 Arizona before returning to the Portland metro area on or about December 21, 2022.

28 33. On January 9, 2023, LONDON-5977 departed Portland, Oregon and historical
 geo-location information placed LONDON-5977 in the area of Missoula, Montana, Bozeman,

Montana, Philadelphia, Pennsylvania and Baltimore, Maryland. On January 27, 2023, Investigators began to receive current geo-location information for LONDON-5977, which again placed LONDON-5977 all over the East Coast, consistent with the locations prostitution ads for D.A. were being posted. For January 9, 2023 through February 27, 2023 (the most recent records from Hilton Domestic Operating Company, Inc.), LONDON rented 74 Hilton-related hotel rooms in his name. Furthermore, based on Special Agent McGeachy's review of the 74 hotel rooms, he noted on at least 26 occasions LONDON rented two hotel rooms at the same Hilton property on the same date, which is consistent with and indicative of reserving a second hotel room for prostitution.

H. LONDON Resides at Vancouver Residence

34. Investigators reviewed Lyft records for LONDON for the time period of September 1, 2021 through January 1, 2023. Special Agent McGeachy noted LONDON's Lyft account was used to purchase rides in various cities across the United States including Bozeman, Montana, Missoula, Montana, Anchorage, Alaska, Vienna, Virginia, Gaithersburg, Maryland, King of Prussia, Pennsylvania, Hartford, Connecticut, Atlantic City, New Jersey, Philadelphia, Pennsylvania, Portland, Oregon and Vancouver, Washington, which are some of the cities/geographic regions that D.A. has prostitution ads and the location LONDON-5977 has shown.

35. On September 1, 2022, an escort ad posted to Skipthegames.com listing the contact phone number Skylar-5186, was listed in Tyson's Corner, Virginia. The ad requested "johns" pay via Cash or **CashApp** [bolded for emphasis]. The ad indicated the female was available for outcall with **Lyft** [bolded for emphasis] or Uber. Thus, I think it's highly likely that LONDON is promoting the ongoing sex trafficking by paying Lyft transportation expenses for outcall services via his CashApp account that is receiving monies from illicit activity such as prostitution.

36. In an effort to identify LONDON's residence, Investigators further reviewed LONDON's Lyft account. Special Agent McGeachy noted Lyft charges, which identified pick up and drop offs for LONDON in and around the area of the **Vancouver Residence**. Special Agent McGeachy noted during the periods of time LONDON was in the Portland metro area (November 21, 2022 through December 6, 2022) and (December 21, 2022 through January 9,

2023), LONDON was picked up by Lyft on seven different occasions from the area of the **Vancouver Residence** and on seven different occasions dropped off in the area of the **Vancouver Residence**, consistent with the **Vancouver Residence** being LONDON's residence. CashApp records identified three different purchases by LONDON from the Walgreens Pharmacy located at 1905 SE 164th Avenue, Vancouver, Washington (only partial address is displayed on the CashApp records of 1905 SE 1), which is approximately 1.4 miles from the **Vancouver Residence**. Moreover, I know individuals commonly utilize a pharmacy closest to their personal residence. Thus, while LONDON is in the Portland/Vancouver metro area, I believe he resides at the **Vancouver Residence** with D.A. and/or Keyasia Woods.

37. Special Agent McGeachy reviewed responsive data dated January 23, 2023 pursuant to a subpoena from The Springs (management company for the **Vancouver Residence**), which provided the rent roll records for the units in close proximity to where LONDON was being picked up by Lyft. Investigators identified a leaseholder with the name of Keyasia Woods for the **Vancouver Residence**. PPB Report 2020-350608 identified Woods as the driver of a purported stolen vehicle and LONDON was the passenger in that vehicle. Investigators subsequently received information from The Springs pursuant to a second subpoena, which indicated that as of January 30, 2023 Keyasia Woods was the current leaseholder for the **Vancouver Residence**, with a listed phone number of (971) 529-7036 (hereinafter, "Woods-7036"). LONDON-5977 had two contacts with Woods-7036 in December 2022. The Springs noted Keyasia Woods has not submitted a 30-day request to terminate the lease at the **Vancouver Residence** and it was currently active. Special Agent McGeachy reviewed responsive data from Clark PUD dated January 24, 2023 for the current utility subscriber at the **Vancouver Residence**. Clark PUD records listed D.A. as the subscriber and the roommate as Keyasia Woods. On March 13, 2023, geo-location information for LONDON-5977, showed LONDON returned to the Portland/Vancouver metro area, having been gone since January 9, 2023. Geo-location information for LONDON-5977, showed LONDON going directly to the area of the **Vancouver Residence**, arriving at approximately 4:20 a.m. I know from my training and experience that individuals who have been out of town for long periods of time and return in the early morning hours often go directly to their place of residence. On March 14, 2023 at approximately 7:28 a.m., Investigators conducted surveillance at the **Vancouver**


1 **Residence** and located the **Dodge Charger** in the driveway, directly in front of the garage. The
 2 registered owner of the **Dodge Charger** is listed as EAN Holdings, which is a rental car
 3 company. I know it is common for individuals involved in illicit activity including sex
 4 trafficking to utilize rental cars to conceal their identity and association to the illegal activity.
 5 EAN (Enterprise) rental car records show the renter of the car as James Caxton Martin. The
 6 agreement lists a credit card with the same name and two contact phone numbers, (971) 207-
 7 2190 and (971) 977-3536 (LONDON-3536). Portland Police records show (971) 207-2190
 8 associated to Caxton Martin. LONDON-3536 has been shown to be associated to LONDON.
 9 Phone toll records for LONDON's current cell phone (LONDON-5977) show LONDON in
 10 frequent contact with Caxton Martin on (971) 207-2190. Special Agent McGeachy noted
 11 multiple large CashApp transfers from the account of Skylar London ending in 0mx5 payable to
 12 James Caxton Martin (shown as "James CastonMartins in CashApp) as follows: February 14,
 13 2023 - \$396.00, February 18, 2023 - \$263.00, February 21, 2023 - \$309.00, February 28, 2023 -
 14 \$354.00 and March 3, 2023 - \$230.00. Based upon surveillance showing LONDON using the
 15 Dodge Charger, Caxton Martin listing LONDON's phone number as a contact number for the
 16 vehicle rental, the phone contact between the LONDON and Caxton Martin and several large
 17 CashApp transfers from Skylar London to Caxton Martin, I believe Caxton Martin is a straw-
 18 renter of the Dodge Charger to conceal the identity of the actual renter. I further believe that
 19 LONDON is using the Dodge Charger to transport D.A. across the United States for facilitate her
 20 involvement in prostitution.

21 38. On March 14, 2023 at approximately 10:03 a.m., geo-location information for
 22 LONDON-5977 showed the phone departed the area of the **Vancouver Residence** and was
 23 traveling eastbound through the Columbia River Gorge. Geo-location information for
 24 LONDON-5977 showed the phone traveled to Missoula, Montana, where LONDON-5977 spent
 25 the night. Surveillance showed the **Dodge Charger** no longer at the **Vancouver Residence**. On
 26 March 14, 2023 and March 15, 2023, D.A. posted online escort advertisements in Missoula,
 27 Montana. Investigators located an escort advertisement, dated March 14, 2023 on
 28 skipthegames.eu, a website used for prostitution. The advertisement was listed under female
 escorts. Following is the March 14, 2023 escort ad.

SKIP THE GAMES! EU MONTANA MISSOULA FEMALE ESCORT WET KINK ONE DAY ONLY

Wet 🌊 one day only come. See me 🌊 25 years old

05:39 PM on 2023-03-14



I see	Men
Race / Regionality	Black / Caribbean, Exotic / Mix
Hair color	Black
Accepted payment methods	Cash, CashApp
Available for	Incall, Outcall
Location	Missoula
Breasts	Medium Natural
Grooming down under	Shaved
March Madness is here	Bet College Hoops

Serious inquiries only please no explicit talk thanks

Waiting and ready for whatever can't wait to hear from you guys come let's have fun

I also do an erotic massage 🍑 for couples or singles it's very relaxing the best intimacy by far

You and are I are the types drawn to the exceptional and the unconventional, drawn to people and places and the things that allow us to get lost in experience. You may not know me yet, but you span worlds where I exist...

I love living every minute to the fullest, nothing holding me back... Won't you join me?

Do not call and low ball

do not call asking what I'm doing we don't one another so please keep professional

do not call asking for address if no show you will be blocked and not allowed to reschedule

set Appointments only last min ok but keep appointments

if any games you will get blocked

Incall available

outcall available

Any no show

or low ball will be blocked

(757)7505186

Activities this service provider may enjoy

- Breast relief / Russian
- Face sitting
- Intercourse - Oral
- Kissing - closed lips
- Massage - sensual
- Oral - receiving (DATY)
- Toy show
- Deep throat
- Girlfriend experience (GFE)
- Intercourse - Vaginal (FS)
- Lunch / dinner dates
- Massage - therapeutic
- Prostate massage
- Water sports - giving

39. Investigators located an escort advertisement, dated March 15, 2023 on onebackpage.com, a website used for prostitution. The advertisement was listed under female escorts and included some of the same photos from the March 14 advertisements.

40. On March 15, 2023, two people were killed in a shooting at the Portland Airport Embassy Suites Hotel. Investigators determined the shooting suspects and victims were gang affiliates associated to LONDON. I know that gang members often seek retribution for acts of violence against them or their affiliates. Per Multnomah County Parole and Probation, LONDON is a known Hoover gang member. On March 15, 2023, LONDON-5977 returned from Montana and on March 16, 2023 at approximately 12:18 a.m. arrived in the area of the **Vancouver Residence**. Once again, geo-location information for LONDON-5977 showed the phone returned directly to the area of the **Vancouver Residence**, consistent with and indicative of LONDON-5977 residing at the **Vancouver Residence**. Based upon LONDON driving to northern Montana, the shooting occurring with known gang associates, and LONDON immediately returning, I believe LONDON will possess firearms, as I know gang members frequently carry firearms to protect themselves and their associates from rival gang members.

41. Approximately ten minutes after LONDON-5977 arrived in the area of the **Vancouver Residence**, Special Agent McGeachy found the **Dodge Charger** parked in the driveway of the **Vancouver Residence**. The kitchen and upstairs bedroom lights were on consistent with LONDON-5977 having just returned to the **Vancouver Residence**. I believe

1 LONDON transported D.A. to Missoula, Montana in the Dodge Charger to facilitate her
2 involvement in prostitution and returned because of the shooting involving his associates.

3 42. On March 21, 2023, geo-location information for LONDON-5977 showed the
4 phone travelling south into California. On that date, the **Dodge Charger** was captured by a
5 license plate reader in Redding, California. Geo-location information for LONDON-5977
6 showed the phone travel to Las Angeles, California and Las Vegas, Nevada before returning to
7 the Portland/Vancouver area. On March 28, 2023, geo-location for LONDON-5977 indicated it
8 began traveling north from Los Angeles, California late that evening. At approximately 3:32
9 p.m. (March 29, 2023), geo-location for LONDON-5977 indicated the phone arrived in the area
10 of the **Vancouver Residence**. Investigators conducted electronic surveillance in the area of the
11 **Vancouver Residence**. Shortly after 3:32 p.m., Investigators observed the **Dodge Charger**
12 parked in front of the **Vancouver Residence**. Investigators observed LONDON and a female
13 moving items from the **Dodge Charger** to the **Vancouver Residence**. Investigators observed
14 LONDON and the female enter the **Vancouver Residence** and close the front door. Geo-location
15 information for LONDON-5977 indicated LONDON remained at the **Vancouver Residence** the
16 entire evening. The next morning, at approximately 8:35 a.m., Investigators observed LONDON
17 exit the **Vancouver Residence**, enter the driver seat of the **Dodge Charger**, and depart the area.
18 Geo-location information for LONDON-5977 also showed to depart the area, consistent with
19 LONDON possessing the phone.

20 43. From January 23, 2023 through March 13, 2023, Investigators drove past the
21 **Vancouver Residence** no fewer than fifteen times during both day and nighttime hours.
22 Investigators did not observe any vehicles parked in front of the garage of the **Vancouver**
23 **Residence** and any movement consistent with an individual maintaining or residing at the
24 **Vancouver Residence** while LONDON and D.A. were out of town.

25 44. Thus, based on LONDON's Lyft pick up and drop offs in the area of the
26 Vancouver Residence, LONDON-5977 going directly to the **Vancouver Residence** after
27 returning to the Portland/Vancouver metro area after long travel periods, the fact that D.A. is the
28 utility subscriber for the Vancouver Residence, I believe that both LONDON and D.A. reside at
the **Vancouver Residence**. Moreover, I believe the **Vancouver Residence** will maintain
evidence of sex trafficking and money laundering including cash, firearms, clothing worn in

46. I know the **Dodge Charger** returned to the **Vancouver Residence** following LONDON and D.A. extensive out of town travels. I know from my training and experience the **Dodge Charger** likely contains evidence of sex trafficking and money laundering, to include receipts of their travels including hotel receipts to promote the ongoing sex trafficking, electronic devices, clothing indicative of a female being involved in prostitution and firearms.

47. Based on my review of both historical and prospective geo-location information regarding the extensive travels of LONDON-5977 and postings of D.A., as well as my review of bank accounts and surveillance observations, at this time I don't believe they have any current legitimate employment. Although, it's possible D.A. could have some type of online business, at this time I don't have any such evidence that is taking place.

48. Based upon my training and experience as well as through speaking with other law enforcement officers and agents who also specialize in investigating sex trafficking, I know

1 the following:

2 a. It is common for traffickers to travel, or have their associates travel, to
3 known regional or national areas of prostitution, to facilitate prostitution.

4 b. Traffickers commonly provide a cellular phone to the prostitute for
5 exclusive use during prostitution activities, and the communication via cellular phones
6 occurs through voice, text, and photo messages, which are often coded to conceal their
7 true meaning from others.

8 c. Using cellular phones, the prostitutes are often only allowed to
9 communicate with the trafficker, customers, and occasionally other individuals subjected
10 to control by the traffickers.

11 d. Cellular phones possessed by the traffickers often display graphic
12 depictions of current or previous prostitutes, or graphics glamorizing the trafficking
13 industry, while the cellular phones possessed by the prostitute commonly display images
14 glamorizing money. These phones also commonly display the contact phone number for
the pimp/trafficker as “daddy” (i.e., “pimp daddy”).

15 e. That traffickers, or their designee, commonly utilize a variety of print
16 media (newspapers, magazines, business cards, flyers), as well as electronic media
17 (internet websites, chat rooms and blogs) to advertise, promote, or otherwise facilitate
18 prostitution.

19 f. Traffickers take, or cause to be taken, photographs of them, their
20 associates, their property, cash, assets and their prostitutes. These traffickers usually
21 maintain these photographs in their possession, particularly in their residences and in
their electronic devices.

22 g. It is common for traffickers to secrete contraband, proceeds of
23 prostitution, and records of prostitution in secure locations on their person, within and
24 around their residences, or in their vehicles, for ready access or to conceal them from law
25 enforcement authorities.

26 h. Traffickers maintain electronic records of prostitution activity and/or
27 advertising via computer or handheld electronic device and/or electronic data storage
28 medium.

i. Traffickers frequently utilize communication devices such as cellular telephone within their trafficking business, and that they often utilize electronic equipment such as computers, currency counting machines, computer watches, and related manuals to generate, transfer, count, record, and/or store information about their trafficking activities and/or information evidencing their participation in, or gains from, their trafficking activities, and/or their financial affairs.

j. Traffickers commonly use aliases when renting and purchasing property to conceal their conduct from law enforcement.

k. Traffickers very often place assets in names other than their own to avoid detection of these assets by law enforcement agencies.

l. Even though these assets are in other persons' names, the traffickers, and/or associates or relatives continue to use these assets and exercise dominion and control over them.

m. When traffickers amass proceeds from prostitution, that the traffickers attempt to legitimize these profits through a variety of means.

n. To accomplish these goals, traffickers utilize tools including domestic banks and their attendant services, securities, cashier's checks, money drafts, letters of credit, brokerage houses, real estate, shell corporations, and business front.

Characteristics of Sex Trafficking as Related to Electronic Devices

49. I know from training and experience in investigating trafficking cases that persons who engage in prostitution activity often use cellular telephones to conduct business, which includes arranging dates and seeking escort advertisements online.

50. I know from training and experience that men seeking sexual services, commonly referred to as a "john," or buyer, will often times call, text, email or use other forms of electronic communication such as texting apps to contact the trafficker or the escort inquiring about sexual services. The content of the communication typically is for how long the escort is available, sexual services offered and the price. I know that "johns"/buyers will frequently ask for real pictures of the escort performing the sexual service and the escort or the trafficker will text real pictures of the escort to the "john." In addition, "johns"/buyers will send pictures of themselves or their genitals while negotiating a prostitution act.

51. From my training and experience a “john”/buyer may communicate with the “pimp”/trafficker or an escort about a date and that communication may discuss explicit acts, arranging meetings, exchanging photos. Such communication can occur through voice phone calls, phone Apps, stored voicemails, images and pictures sent between the “john”/buyer and the escort or “pimp”/trafficker, text messages, chats, or similar plain text communications, and email communications.

52. I know that electronic devices, to include cellular phones are commonly used to store photos and videos. Additionally, I know that electronic devices, to include cellular phones, tablets and computers, have cameras capable of taking photographs and videos, to record events of abuse, photos for ads, and for exchanging photos between others involved in trafficking.

53. Based on my review of evidence in this investigation, I know D.A. is posting to various adult escort websites including SkiptheGames.eu, Megapersonals.eu and Onebackpage.com. Moreover, D.A. and/or LONDON has used multiple cellular telephones to post to these adult websites, communicate with johns and arrange dates in exchange for money. I know from my training and experience, that cellular telephones will contain evidence of an individual’s travel including airline boarding passes, CashApp verification and hotel reservations including hotel loyalty program number, which is used to secure points for free hotel nights. Accordingly, I believe electronics are used in this investigation and will be located at the **Vancouver Residence, Dodge Charger and Bennie LONDON.**

Electronic Items

54. As outlined above and in Attachment B, I seek authority to seize electronic devices from the **Vancouver Residence** including cellular telephones, laptops and/or desktop computers. This warrant seeks only to seize these electronic items, and subsequent search warrants may be requested in the District of Oregon to search and seize evidence from the electronic items taken from the **Vancouver Residence.**

Conclusion

55. Based on my training, experience, and the investigation to date I believe that Bennie LONDON, D.A. and others are involved in committing the Target Offenses, and that evidence of the Target Offenses will be found in a search of the **Vancouver Residence, Dodge Charger and LONDON.**

56. Based on the foregoing, I have probable cause to believe, and I do believe, that Bennie LONDON has committed and others committed violations of Title 18, United States Code, Section 2421, transportation of an individual with the intent to engage in prostitution, and Title 18, United States Code, Section 1956, laundering of illegal proceeds, and, and that evidence of those Target Offenses, as more fully described in Attachment B, are presently contained at the **Vancouver Residence, Dodge Charger and Bennie LONDON** located in the Western District of Washington, which are more fully described above and in Attachment A-1 through A-3 hereto. I therefore request that the Court issue warrants authorizing a search of the **Vancouver Residence, Dodge Charger and Bennie LONDON** described in Attachment A-1 through A-3 for the items listed in Attachment B.



SCOTT MCCOLLISTER
Task Force Officer, FBI

The above-named agent provided a sworn statement attesting to the truth of the contents of the foregoing affidavit by telephone on this 12th day of April, 2023.



THE HON. THERESA FRICKE
United States Magistrate Judge

Case No.:

Copy of warrant and inventory left with:

Inventory of the property taken and name of any person(s) seized:

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

Executing officer's signature

Printed name and title

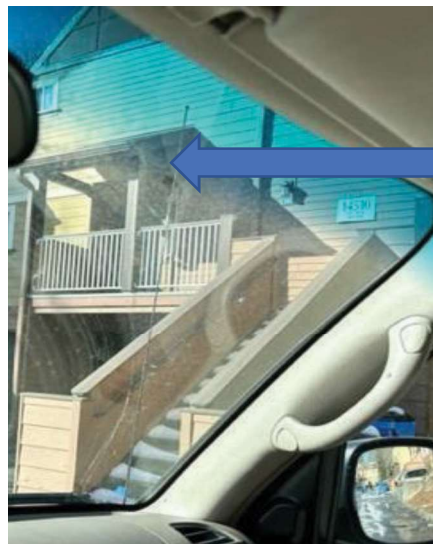
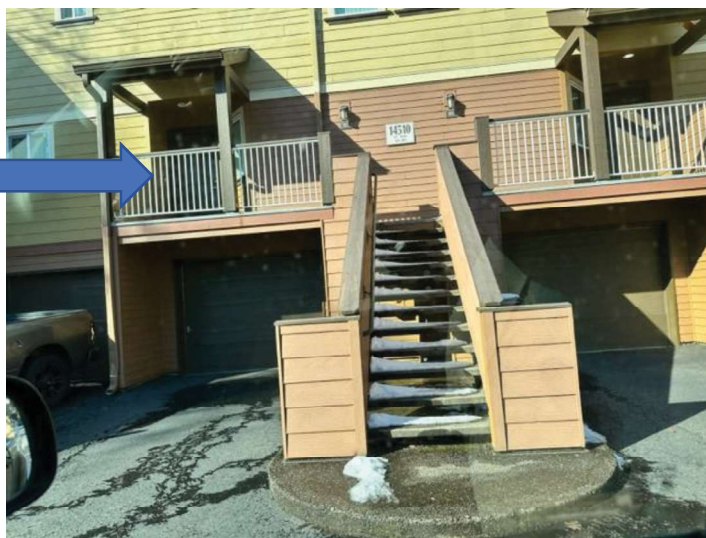
ATTACHMENT A-1

PREMISES TO BE SEARCHED

Based upon the information contained in this affidavit, I am requesting a warrant to search the following location, to include any locked container found on the premises:

14510 SE 31st Way, Apt. 182, Vancouver, Washington 98683

is an apartment complex located in the neighborhood of Fisher's Landing in Vancouver, Washington located on SE 31st Way. Access to SE 31st Way is gained by turning north on SE 31st Way from SE Cascade Park Drive. As you turn north onto SE 31st Way, units 181-188 are located within the third block of apartment buildings from SE Cascade Park Drive. On the outside of the third apartment building is a white sign bearing "14510 31st Way". Underneath the white sign 14510 SE 31st Way is listed "181-188". Apartment 182 is the unit directly to the west of the white sign depicting "14510 SE 31st Way 181-188". To access apartment 182 you walk up a block of steps directly towards the white sign "14510 SE 31st Way" and turn to the west. There is an outside light and underneath the light bears the numbers "182". The bottom half of the apartment complex is dark brown, with white trim separating the middle part of the building and a light brown color on the top third of the apartment complex. The top V frame of the building is dark brown in color with white trim. The front door to unit 182 is depicted with arrows below.



ATTACHMENT B

Items to Be Seized

The items to be searched for, seized, and examined, are those items on the premises located at 14510 SE 31st Way, Apt. 182, Vancouver, Washington 98683, 2021 Dodge Charger bearing California license plate 8YAZ411 and the person of Bennie Gene London referenced in Attachments A-1 through A-3 that contain evidence, contraband, fruits, and instrumentalities of violations of Title 18, United States Code, Section 2421, transporting an individual interstate or foreign commerce for purposes of prostitution and Title 18, United States Code, Section 1956, money laundering. The items to be seized cover the period of June 1, 2020 through the date of the execution of the search warrant.

1. The items referenced above to be searched for, seized, and examined are as follows:

a. Books, records, receipts, notes, ledgers, diaries, accounting, postings, communication and financial transactions relating to promoting and facilitating prostitution, prostitution and money laundering;

b. Personal books and papers reflecting names, addresses, telephone numbers, articles of clothing, photos and other contacts for the purpose of promoting or facilitating prostitution;

c. Financial profits, proceeds and instrumentalities of facilitating and promoting prostitution, prostitution and money laundering, including U.S. Currency, virtual currency including Bitcoin, Coinbase account records, bitcoin wallets, bitcoin transactions, prepaid debit cards, credit cards, CashApp cards, PayPal cards;

d. Books, records, receipts, notes, ledgers, and other documents relating to financial transaction, communications related to facilitating and promoting prostitution, prostitution and money laundering, and evidence of the use of individuals to disguise profits, vehicles, apartments, vehicle purchase documentation, rental vehicles, property records, vehicle titles for the time period of June 1, 2020 to the present;

e. Firearms and other dangerous weapons, ammunition, magazines and body armor;

f. Personal books and papers reflecting names, addresses, telephone numbers, articles of clothing, photos and other contacts including identification data relating to the promoting and facilitating prostitution, prostitution and money laundering for the time period of June 1, 2020 to the present;

g. Financial records and personal objects relating to facilitating prostitution and prostitution income, money laundering and expenditures of money and wealth, to-wit: money orders, wire transfer records, cashier's checks and receipts, checks, bank account records, passbooks, tax records, W-2's, 1099's, safe deposit box keys and records, checkbooks, title files, vehicle purchases and check registers, as well as items of unexplained wealth including precious metals/jewelry such as gold, silver, diamonds, Rolex watches, earrings, pendants, necklaces, rings, etc., designer shoes, designer clothing, designer luggage including brands such as Gucci, Versace, and Luis Vuitton for the time period of June 1, 2020 to the present;

h. Items of personal property that tend to identify the person(s) in residence, occupancy, control, or ownership of the premises, including canceled mail, deeds, leases, rental agreements, photographs, personal telephone books, diaries, utility and telephone bills, statements, identification documents, and keys;

i. Documents indicating travel in interstate and foreign commerce, to include

airline tickets, notes and travel itineraries; airline schedules; bills; charge card receipts; hotel, motel, and car rental statements; correspondence with travel agencies and other travel-related businesses; airline, rent-a-car, and hotel frequent flier or user cards and statements; passports and visas; telephone bills; photographs of foreign locations; and papers relating to domestic and international travel for the time period of June 1, 2020 to the present;

j. Cellular telephones, computers and other electronic storage/communication devices capable of storing data to access the internet, book transportation services online, book hotel reservations, access e-mail, send and receive text messages, store records of financial transactions and debts, access online bank records that constitute evidence or instrumentality of facilitating and promoting prostitution, prostitution and money laundering.

Case No.:

Copy of warrant and inventory left with:

Inventory of the property taken and name of any person(s) seized:

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

Executing officer's signature

Printed name and title

ATTACHMENT A-2
VEHICLE TO BE SEARCHED

Based upon the information contained in this affidavit, I am requesting a warrant to search the following vehicle:

Green 2021 Dodge Charger, California license plate 8YAZ411, VIN: 2C3CDXBG9MH632666



ATTACHMENT B

Items to Be Seized

The items to be searched for, seized, and examined, are those items on the premises located at 14510 SE 31st Way, Apt. 182, Vancouver, Washington 98683, 2021 Dodge Charger bearing California license plate 8YAZ411 and the person of Bennie Gene London referenced in Attachments A-1 through A-3 that contain evidence, contraband, fruits, and instrumentalities of violations of Title 18, United States Code, Section 2421, transporting an individual interstate or foreign commerce for purposes of prostitution and Title 18, United States Code, Section 1956, money laundering. The items to be seized cover the period of June 1, 2020 through the date of the execution of the search warrant.

1. The items referenced above to be searched for, seized, and examined are as follows:

a. Books, records, receipts, notes, ledgers, diaries, accounting, postings, communication and financial transactions relating to promoting and facilitating prostitution, prostitution and money laundering;

b. Personal books and papers reflecting names, addresses, telephone numbers, articles of clothing, photos and other contacts for the purpose of promoting or facilitating prostitution;

c. Financial profits, proceeds and instrumentalities of facilitating and promoting prostitution, prostitution and money laundering, including U.S. Currency, virtual currency including Bitcoin, Coinbase account records, bitcoin wallets, bitcoin transactions, prepaid debit cards, credit cards, CashApp cards, PayPal cards;

d. Books, records, receipts, notes, ledgers, and other documents relating to financial transaction, communications related to facilitating and promoting prostitution, prostitution and money laundering, and evidence of the use of individuals to disguise profits, vehicles, apartments, vehicle purchase documentation, rental vehicles, property records, vehicle titles for the time period of June 1, 2020 to the present;

e. Firearms and other dangerous weapons, ammunition, magazines and body armor;

f. Personal books and papers reflecting names, addresses, telephone numbers, articles of clothing, photos and other contacts including identification data relating to the promoting and facilitating prostitution, prostitution and money laundering for the time period of June 1, 2020 to the present;

g. Financial records and personal objects relating to facilitating prostitution and prostitution income, money laundering and expenditures of money and wealth, to-wit: money orders, wire transfer records, cashier's checks and receipts, checks, bank account records, passbooks, tax records, W-2's, 1099's, safe deposit box keys and records, checkbooks, title files, vehicle purchases and check registers, as well as items of unexplained wealth including precious metals/jewelry such as gold, silver, diamonds, Rolex watches, earrings, pendants, necklaces, rings, etc., designer shoes, designer clothing, designer luggage including brands such as Gucci, Versace, and Luis Vuitton for the time period of June 1, 2020 to the present;

h. Items of personal property that tend to identify the person(s) in residence, occupancy, control, or ownership of the premises, including canceled mail, deeds, leases, rental agreements, photographs, personal telephone books, diaries, utility and telephone bills, statements, identification documents, and keys;

i. Documents indicating travel in interstate and foreign commerce, to include

airline tickets, notes and travel itineraries; airline schedules; bills; charge card receipts; hotel, motel, and car rental statements; correspondence with travel agencies and other travel-related businesses; airline, rent-a-car, and hotel frequent flier or user cards and statements; passports and visas; telephone bills; photographs of foreign locations; and papers relating to domestic and international travel for the time period of June 1, 2020 to the present;

j. Cellular telephones, computers and other electronic storage/communication devices capable of storing data to access the internet, book transportation services online, book hotel reservations, access e-mail, send and receive text messages, store records of financial transactions and debts, access online bank records that constitute evidence or instrumentality of facilitating and promoting prostitution, prostitution and money laundering.

UNITED STATES DISTRICT COURT

for the
Western District of Washington

In the Matter of the Search of)
(Briefly describe the property to be searched)
or identify the person by name and address))

Case No. 3:23-mj-05142-03

TARGET PERSON Bennie Gene London, a black male,)
date of birth: XX/XX/1996, 5'7", 150 pounds, as further)
described in Attachment A-3.)

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Western District of Washington
(identify the person or describe the property to be searched and give its location):

Target Person Bennie Gene London, a black male, date of birth: XX/XX/1996, 5'7", 150 pounds, as further described in Attachment A-3.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment B for List of Items to be Seized.

YOU ARE COMMANDED to execute this warrant on or before April 26, 2023 (not to exceed 14 days)

☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to any U.S. Magistrate Judge in this district.
(United States Magistrate Judge)

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)

☐ for days (not to exceed 30) ☐ until, the facts justifying, the later specific date of .

Date and time issued: April 12, 2023 at 10:50 AM



Judge's signature

City and state: Tacoma, Washington

Theresa Fricke, U.S. Magistrate Judge

Printed name and title

Return

Case No.:

Date and time warrant executed:

Copy of warrant and inventory left with:

Inventory made in the presence of:

Inventory of the property taken and name of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

Executing officer's signature

Printed name and title

ATTACHMENT A-3
PERSON TO BE SEARCHED

Based upon the information contained in this affidavit, I am requesting a warrant to search the following individual:

Bennie Gene London, black male, date of birth: XX/XX/1996, 5'7", 150 pounds



ATTACHMENT B

Items to Be Seized

The items to be searched for, seized, and examined, are those items on the premises located at 14510 SE 31st Way, Apt. 182, Vancouver, Washington 98683, 2021 Dodge Charger bearing California license plate 8YAZ411 and the person of Bennie Gene London referenced in Attachments A-1 through A-3 that contain evidence, contraband, fruits, and instrumentalities of violations of Title 18, United States Code, Section 2421, transporting an individual interstate or foreign commerce for purposes of prostitution and Title 18, United States Code, Section 1956, money laundering. The items to be seized cover the period of June 1, 2020 through the date of the execution of the search warrant.

1. The items referenced above to be searched for, seized, and examined are as follows:
 - a. Books, records, receipts, notes, ledgers, diaries, accounting, postings, communication and financial transactions relating to promoting and facilitating prostitution, prostitution and money laundering;
 - b. Personal books and papers reflecting names, addresses, telephone numbers, articles of clothing, photos and other contacts for the purpose of promoting or facilitating prostitution;
 - c. Financial profits, proceeds and instrumentalities of facilitating and promoting prostitution, prostitution and money laundering, including U.S. Currency, virtual currency including Bitcoin, Coinbase account records, bitcoin wallets, bitcoin transactions, prepaid debit cards, credit cards, CashApp cards, PayPal cards;

d. Books, records, receipts, notes, ledgers, and other documents relating to financial transaction, communications related to facilitating and promoting prostitution, prostitution and money laundering, and evidence of the use of individuals to disguise profits, vehicles, apartments, vehicle purchase documentation, rental vehicles, property records, vehicle titles for the time period of June 1, 2020 to the present;

e. Firearms and other dangerous weapons, ammunition, magazines and body armor;

f. Personal books and papers reflecting names, addresses, telephone numbers, articles of clothing, photos and other contacts including identification data relating to the promoting and facilitating prostitution, prostitution and money laundering for the time period of June 1, 2020 to the present;

g. Financial records and personal objects relating to facilitating prostitution and prostitution income, money laundering and expenditures of money and wealth, to-wit: money orders, wire transfer records, cashier's checks and receipts, checks, bank account records, passbooks, tax records, W-2's, 1099's, safe deposit box keys and records, checkbooks, title files, vehicle purchases and check registers, as well as items of unexplained wealth including precious metals/jewelry such as gold, silver, diamonds, Rolex watches, earrings, pendants, necklaces, rings, etc., designer shoes, designer clothing, designer luggage including brands such as Gucci, Versace, and Luis Vuitton for the time period of June 1, 2020 to the present;

h. Items of personal property that tend to identify the person(s) in residence, occupancy, control, or ownership of the premises, including canceled mail, deeds, leases, rental agreements, photographs, personal telephone books, diaries, utility and telephone bills, statements, identification documents, and keys;

i. Documents indicating travel in interstate and foreign commerce, to include

airline tickets, notes and travel itineraries; airline schedules; bills; charge card receipts; hotel, motel, and car rental statements; correspondence with travel agencies and other travel-related businesses; airline, rent-a-car, and hotel frequent flier or user cards and statements; passports and visas; telephone bills; photographs of foreign locations; and papers relating to domestic and international travel for the time period of June 1, 2020 to the present;

j. Cellular telephones, computers and other electronic storage/communication devices capable of storing data to access the internet, book transportation services online, book hotel reservations, access e-mail, send and receive text messages, store records of financial transactions and debts, access online bank records that constitute evidence or instrumentality of facilitating and promoting prostitution, prostitution and money laundering.